

IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

HOLCOMBE, et. al,

Plaintiffs

vs.

UNITED STATES OF AMERICA,

Defendant

NO. 5:18-CV-00555-XR

(consolidated cases)

**PLAINTIFFS' SECOND *SUPPLEMENTAL*¹ COMBINED
DESIGNATION OF TESTIFYING EXPERTS**

Plaintiffs serve this Second *Supplemental* Combined Designation of Testifying Experts pursuant to Fed. R. Civ. P. 26(a)(2)(B), the Court's Scheduling Order, and the agreement of the parties.

I. TESTIFYING EXPERTS

Common Liability Expert Witnesses

All Plaintiffs designate the following retained expert witnesses to provide testimony in this case regarding common liability issues affecting all cases:

¹ Revisions / additions appear in ***bold italics*** for convenience.

1. Larry D. Youngner, Colonel, USAF (Ret.)

Areas of Expertise: Government Investigations, Policies and Procedures

Col. Youngner has an extensive background in Military & National Security Law, including direct experience as Air Force Judge Advocate General (JAG) Corps Chief of Staff at The Pentagon, Staff Judge Advocate (SJA) at AF Special Operations Command (AFSOC), SJA, 9th AF & AF Central Command (USAFCENT), Shaw AFB, SC & Doha, Qatar, and Director, International & Operations Law, HQ, USAF at The Pentagon, among many other distinguished positions. For a more detailed summary of Col. Youngner's skills, training, education, experience, and knowledge, please see his curriculum vitae, which is attached as noted in the chart below and is incorporated by reference into this designation.

Col. Youngner will testify as to the criminal investigation aspects of the events and government conduct and history leading up to the Sutherland Springs shooting, including an assessment of what compliance requirements existed, and what consequences resulted from any acts or omissions of the United States Air Force (USAF) and DoD personnel involved in this matter, and related issues in this case for all Plaintiffs. He will testify to any subject on which he has factual knowledge or is within his area of expertise. He will testify regarding any opinion or fact or issue raised by the Defendant, its employees, any of Defendant's witnesses, or any Defense expert within his area of expertise.

Col. Youngner's opinions are based on reviews of evidence including selected Department of Defense (DoD) documents, DoD Inspector General (IG) reports, depositions and exhibits presented to the deposed witnesses in this case, and documents produced in this case, testimony taken and to be taken in this case, any specific literature he may have relied upon, and his education, training, and experience.

Including the records cited by Col. Youngner in his report, he has also relied on the following documents:

Depositions:

12.05.19	Albright, Jacqueline
01.16.20	Bearden, Lt. Col. Robert C.
01.07.20	Del Greco, Kimberly J.
12.13.19	Holz, Yonatan
01.07.20	Hoy, James
01.16.20	Hudson, James
01.09.20	McLeod-Hughes, Nathan
01.10.20	Mills, Clinton
12.18.19	Owen, Col. John
01.14.20	Sablan, Ryan
09.19.19	Spencer, Special Agent Robert
12.04.19	Tullos, Col. Owen W.
12.17.19	Verdego, Shelly Ann

Documents produced by Defendant:

USA0000034-417 AFI 71-121

USA0001343-1395 AFI 71-205

USA0001806-1818 DODI 5505.11

USA0004442-4542 DoD Manual 7730.47-M, Vol 2 - DIBRS: Supporting Codes, 12/7/10, incorp change 4/6/17

USA0004931-5013 DoD Manual 7730.47-M, Vol 1 - DIBRS: Data Segments and Elements, 12/7/10, incorp change 12/7/10

USA0005014-5111 DoD Manual 7730.47-M, Vol 2 - DIBRS: Supporting Codes, 12/7/10

USA0005112-5249 DODIG-2019-030, 12/6/18

USA0005250-5387 DODIG-2019-030, 12/6/18

USA0005399-5405 Letter from DOJ Chief Counsel to Program Mgr at DOD IG

USA0005425-5433 AG Fine Testimony

USA0005457-5612 AFI 31-205
USA0005759-5827 AFI 31-206
USA0006816-7203 Navy Inst 1640.9c
USA0007575-7647 AFI 40-301
USA0010238-10243 CJIS Lindquist Testimony
USA0011166-11220 DoDIG Evaluation of DoD Compliance with Criminal
History Data Reporting Requirements
USA0011221-11312 DoDIG-2018-035, Evaluation of Fingerprint Card and Fi-
nal Disposition Report Submissions by Military Service Law Enforcement Or-
ganizations, 12/04/17
USA0011697-11732 DoDIG-2015-081, Evaluation of Department of Defense
Compliance with Criminal History Data Reporting Requirements, 02/12/15
USA0011733-12132 AFI 51-201
USA0012133-12135 Kelley Firearm Transfer Record (Feb 12, 2012)
USA0012136-12140 Kelley Firearm Transfer Record (Apr 12, 2012)
USA0012797-12808 ATF Report of Investigation
USA0012877-12882 Devin Kelley Report of Trial (Nov. 7, 2012)
USA0012797-12808 Kelley Firearms Transfer Record (Dec 22, 2014)
USA0012893-12895 Kelley Firearms Transfer Record (Dec 22, 2014)
USA0012896-12898 Kelley Firearms Transfer Record (Oct 18, 2017)
USA0012899-12907 Kelley AR557 Transfer Record (Apr 7, 2016)
USA0012908 US DOJ Bureau of Alcohol, Tobacco, Firearms and Explosives,
Firearms Transaction Record Part I - Over the Counter form for Kelley, EAA
Windicator, 02/12/12
USA0012947-12948 Devin Kelley Report of Trial (Nov. 7, 2012)
USA0012953-12958 Unsubmitted Fingerprints/Disposition of Kelley
USA0013309-10 12.05.04 email from MIL re Kelley's gun possession
USA0013311-14 D-Dex offense report re domestic disturbance call
USA0013315-92 49th SF "Hot" file
USA0013393-14181 I2MS AFOSI case file
USA0014693-94 Personal Information File DK
USA0014698 Personal Information File DK

USA0014704 Personal Information File DK
USA0014752 Personal Information File DK
USA0014960-61 12.02.17 AF Memo to Kelley - no contact order
USA0015371-15373 Kelley Firearms Transfer Records (June 26, 2015)
USA0015525-15640 AFOSI Investigation file
USA0016510-16511 Kelley DMNDBK DB9 9mm Order Form (Jun 7, 2012)
USA0016836 Kelley DIBRS entry
USA0016837-16840 Email concerning FBI data on Kelley
USA0017735-74 IG report, Evaluation of the Defense Criminal Investigative Organizations' DIBRS, 10/29/14
USA0019707 Reviewer and IDP notes on Kelley case file
USA0021235 Kelley mental health and medical records
USA0021241 Kelley mental health and medical records
USA0021823-24 Interview of Troy Bizzack
USA0022295-22300 ATF Brandon Testimony
USA0022301-22313 AFT Brandon Answers
USA0022314-22318 CJIS Lindquist Testimony
USA0022319-22323 AF Sec. Wilson Answers
USA0022324-22325 AF Testimony Sec. Wilson Testimony
Documents produced by Plaintiffs:
SSS-000001-40 2014 DOD IG Report.pdf
SSS-000041-76 2015 DOD IG Report.pdf
SSS-000077-168 2017 DOD IG report
SSS-000169-306 2018 DOD IG report
SSS-000404-405 Wilson Report to Committee on Judiciary US State.pdf
SSS-000406-410 Questions for USAF Sec Wilson.pdf
SSS-001112 2017.12.06 Senate Judiciary Committee Hearing.mp4
SSS-001113-001121 2017.12.06 IG Glenn Fine Statement
SSS-001125-001129 2017.12.06 Dir. Lindquist Statement
SSS-001148-001152 FBI Dir Lindquist Written Testimony to Senate
SSS-001330-001332 Press Release - OSI owns indexing response, way ahead

Pleadings:

DKT #149 Stipulations

At this time, Plaintiffs have no further knowledge of the mental impressions, opinions and facts known to this expert other than those contained in his report. For a more detailed discussion of his opinions and bases for those opinions, please see his report, which is attached as noted in the chart below and incorporated by reference into this designation. Col. Youngner is available for deposition and Defendant may examine him for a more detailed explanation of his opinions and basis for those opinions relating to this case. Once he has given deposition or other testimony in this case, Plaintiffs incorporate such testimony by reference into this designation.

Col. Youngner has not testified within the past four years; accordingly, no testimony list is provided. However, his fee schedule is attached as noted in the chart below and are incorporated by reference into this designation.

Col. Youngner reserves the right to use any exhibits previously produced by Plaintiffs, any part or part of his expert report or cited literature, any exhibits that have or will be exchanged in discovery, any documents produced by the United States in this litigation (USA00001-USA0032443 as of the date of this filing, plus any additional documents to be produced), and any documents that he brings with him to his deposition. Col. Youngner also reserves the right to use summary tables to describe his opinions.

Description	Type	Case #²	Bates Beginning	Bates Ending
5:18-cv-0055 (SSS Common Documents)				
Youngner Report, CV & Attachments	Expert	SSS	002421	002525
Youngner CV	Expert	SSS	002352	002373
Youngner Fee Schedule	Expert	SSS	002374	002374

2. Hon. Jon T. Rymer

Areas of Expertise: Inspector General Process and Oversight of Criminal History Data Reporting at the Department of Defense

The Honorable Jon T. Rymer was a presidential appointee in both the Barack Obama and George W. Bush administrations serving as the Inspector General at the US Department of Defense, the Federal Deposit Insurance Corporation and the US Securities and Exchange Commission. Mr. Rymer served as a federal Inspector General for over 9 years. Mr. Rymer also served as the Chair of the Audit Committee for the Council of Inspectors General for Integrity and Efficiency and as Chair of the Comptroller General's Advisory Council on Standards of Internal Control in the Federal Government (the GAO Green Book) and as a member of GAO's Advisory Council on Government Auditing Standards. Mr. Rymer earned a BA in Economics from the University of Tennessee and an MBA from the University of Arkansas at Little Rock. Mr. Rymer holds several financial and auditing certifications including:

² Documents Common to all Plaintiffs are referred to herein as "Common Documents" and bear the Bates number prefix: "SSS-"

Certified Internal Auditor, Certified Government Auditing Professional and Certified Defense Financial Manager. Mr. Rymer was awarded the Department of Defense Medal for Distinguished Public service by the Secretary of Defense. Mr. Rymer served over 30 years in the active and reserve components of the US Army and is a graduate of the US Army Inspector General School. Upon his retirement from the Army, Mr. Rymer was awarded the United States Legion of Merit.

For a more detailed summary of Mr. Rymer's skills, training, education, experience, and knowledge, please see his curriculum vitae, which is attached as noted in the chart below and is incorporated by reference into this designation.

Mr. Rymer will testify regarding the roles, organization, standards, governance and authorities of Federal Inspectors General at the government wide level, as well as at the Department of Defense level, his review of reports from the Department of Defense Office of Inspector General (DODIG) concerning criminal history data reporting, and related issues in this case for all Plaintiffs. He will testify to any subject on which he has factual knowledge or is within his area of expertise. He will testify regarding any opinion or fact or issue raised by the Defendant, its employees, any of Defendant's witnesses, or any Defense expert within his area of expertise.

Mr. Rymer's opinions are based on reviews of evidence including selected Department of Defense (DoD) documents, DoD Inspector General (IG) reports, depositions and exhibits presented to the deposed witnesses in this case, and documents produced in this case, testimony taken and to be taken in this case, any specific literature he may have relied upon, and his education, training, and experience.

At this time, Plaintiffs have no further knowledge of the mental impressions, opinions and facts known to this expert other than those contained in his report. For a more detailed discussion of his opinions and bases for those opinions, please

see his report, which is attached as noted in the chart below and incorporated by reference into this designation. Mr. Rymer is available for deposition and Defendant may examine him for a more detailed explanation of his opinions and basis for those opinions relating to this case. Once he has given deposition or other testimony in this case, Plaintiffs incorporate such testimony by reference into this designation.

Mr. Rymer has not testified in a case in the last four years. His rate of compensation is as follows: a flat non-refundable \$750.00/month for the duration of the case engagement; \$300.00 per hour for work performed; and \$400.00 per hour for deposition and/or trial testimony.

Mr. Rymer reserves the right to use any exhibits previously produced by Plaintiffs, any part or part of his expert report or cited literature, any exhibits that have or will be exchanged in discovery, any documents produced by the United States in this litigation (USA00001-USA0032443 as of the date of this filing, plus any additional documents to be produced), and any documents that he brings with him to his deposition. Mr. Rymer also reserves the right to use summary tables to describe his opinions.

Description	Type	Case #	Bates Beginning	Bates Ending
5:18-cv-0055 (SSS Common Documents)				
Rymer Report, CV & Attachments	Expert	SSS	002375	002420

3. Daniel W. Webster, Sc.D., M.P.H.

Areas of Expertise: Epidemiology of Firearm Violence, Public Health Policy, Methodological Issues in Injury and Violence

Dr. Webster is the Bloomberg Professor of American Health in Violence Prevention in the Department of Health Policy and Management at Johns Hopkins Bloomberg School of Public Health in Baltimore, MD. He is also the Director of Research Center Participation at Johns Hopkins Bloomberg School of Public Health Center. Dr. Webster received his Doctor of Science from The Johns Hopkins University, School of Hygiene and Public Health, Department of Health Policy and Management, his Master of Public Health from The University of Michigan, School of Public Health, Department of Health Planning and Administration, and his B.A. from The University of Northern Colorado in Psychology. For a more detailed summary of Dr. Webster's skills, training, education, experience, and knowledge, please see his curriculum vitae, which is attached as noted in the chart below and is incorporated by reference into this designation.

Dr. Webster will testify as to the epidemiological aspects of the Sutherland Springs shooting, including his findings that access to firearms by individuals with a history of domestic violence and suicidality greatly increases the risk that those individuals will commit serious acts of violence including homicide, and fatal mass shootings and that denials of applications to purchase firearms due to the applicant's history of violence, other criminal acts, or threatening behaviors resulting from mental illness reduce the risk of the applicant's risk of committing acts of violence, as well as related issues in this case for all Plaintiffs. He will further testify that the Government's negligent conduct in this case increased the risk of harm to the American public, including individuals like the Plaintiffs. He will testify to any subject on which he has factual knowledge or is within his area of expertise. He will testify regarding any opinion or fact or issue raised by the Defendant, its employees, any of Defendant's witnesses, or any Defense expert within his area of expertise.

Dr. Webster's opinions are based on reviews of evidence including epidemiological data and research relating to access to firearms by individuals with a history of domestic violence and suicidality and the risk that those individuals will commit serious acts of violence including homicide, and fatal mass shootings, epidemiological data and research relating to denials of applications to purchase firearms due to the applicant's history of violence, other criminal acts, or threatening behaviors resulting from mental illness reduce the risk of the applicant's risk of committing acts of violence, selected documents produced in this case, depositions and exhibits presented to the deposed witnesses in this case, and documents produced in this case, testimony taken and to be taken in this case, any specific literature he may have relied upon, and his education, training, and experience. Including the records cited by Dr. Webster in his report *and deposition*, he has also relied on the following documents:

Depositions:

01.07.20 Del Greco, Kimberly J.
05.26.20 Willis, Emily
06.18.20 Marlowe, Candace
07.07.20 Snyder, Terry

Documents produced by Defendant:

USA0005250-5387 DODIG-2019-030, 12/6/18
USA00005399-5405 Ltr from DOJ Chief Cnsl to Program Mgr at DOD IG
USA00005406 Federal Firearms Prohibition under 18 USC § 922(g)(4)
USA0005425-5433 AG Fine Testimony
USA0010238-10243 CJIS Lindquist Testimony
USA0011166-11220 DoDIG Evaluation of DoD Compliance with Criminal History Data Reporting Requirements
USA0011221-11312 IG Report Reporting
USA0012133-12135 Kelley Firearm Transfer Record (Feb 12, 2012)

USA0012136-12140 Kelley Firearm Transfer Record (Apr 12, 2012)

USA00012141-12148 Memo of Agrmt Between 49th Med Group & Peak Behav Helath Srvc

USA00012149-12157 Memo of Understanding Between 49th Med Group & Peak Behaviour Health Srvc

USA00012158-12163 El Paso PD IncidentInvestigation Rpt 6.7.12

USA0012797-12808 ATF Report of Investigation

USA00012857-12876 Comal County Sheriff Criminal Offense Rpt, Sexual

USA00012883-12892 Cnty Ct, Paso Restitution Payout Order

USA0012877-12882 Devin Kelley Report of Trial (Nov. 7, 2012)

USA0012893-12895 Kelley Firearms Transfer Record (Dec 22, 2014)

USA0012896-12898 Kelley Firearms Transfer Record (Oct 18, 2017)

USA0012899-12907 Kelley AR557 Transfer Record (Apr 7, 2016)

USA00012908-12910 US DoJ Firearms Transaction Rec, Kelley 12.12.12

USA0012947-12948 Devin Kelley Report of Trial (Nov. 7, 2012)

USA0012953-12958 Unsubmitted Fingerprints/Disposition of Kelley

USA00013309-13310 Email from MIL re Kelley's Gun Possession

USA00013311-13314 D-Dex Offense Rpt re Domestic Dist Call

USA00013315-13392 Kelley Barment-Rqst for expulsion & Order not to renter Holoman AFB

USA0013393-14181 I2MS AFOSI case file

USA00014490-14571 Request & Auth for Separation 5.9.14

USA00014681-14692 New Braunfels PD Rpt, Indecency with a Child Sexual Contact

USA00014693-14798 Kelley Personal Information File

USA00014960-14961 AF Memo to Kelley - No Contact Order

USA00014962-15083 Pretrial Allied Papers

USA00015084-15085 AFOSI's Resp to DoD OIG Project 3.13.18

USA00015086-15093 Kelley Charge Sheet 7.26.12

USA00015094-15145 Naval Consolidated Brig Miramar Pre & Post Trial Prisoner Rec Checklist re Kelley

USA00015241-15246 Interview Summary of Danielle Shields Kelley

USA00015247-15270 Comal Cnty Sheriff's Offense Rpt-Sexual Assault
USA00015271-15280 Comal Cnty Sheriff's Call Notes Rpt
USA00015281-15362 Request & Authorization for Separation
USA00015363-15366 El Paso County Sheriff's Ofc Summ, Cruelty to Animal
USA00015374-15522 DoD Consolidated Adjudications Facility file on Kelley
USA0015367-15370 Interview Thumbnail, Mrs. Valerie Lynn Rowe (Jan. 18, 2018)
USA0015371-15373 Kelley Firearms Transfer Records (June 26, 2015)
USA00015523 Peak Behavioral Health Admit Rec
USA00015525-15640 AF memo to DoD OIG re Investigation of AF Active Shooting
& Criminal Hx Rptng
USA00015641-15643 Review of Kelley's DMDC Installation Access Rec
USA00016126-16280 Interview of Danielle Kelley
USA00016281-16308 NAVCONBRIG Miramar Prisoner Education Survey of Kelley
USA00016362-16366 DoDIG coordination with DPS re Kelley project
USA00016393-16509 Certf of Release or Discharge frm Active Duty
USA0016510-16511 Kelley DMNDBK DB9 9mm Order Form (Jun 7, 2012)
USA0016837-16840 Email concerning FBI data on Kelley
USA00016902-17725
USA00021118-21658 The Peak Behavioral Health Srvcs [M-Informal] - Devin Kelley
USA00021659-21722 Kelley's Mental Health Recs
USA00021724-21755 Kelley's Journal
USA00021774-21775 Recorded Interview - Dawn Hankins [Former Staff Judge Advocate]
USA00021823-21824 Telephone Interview of Troy Bizzack-Eval of Kelley Invstg
USA00021840-21844 Interview Summary of Tessa Brennaman (Kelley's GF)
USA00021845 Recorded Interview of Tessa Brennaman (Kelley's GF)
USA00021846-21869 Interview Transcription of Tracy Wolfe
USA00021870 Recorded Interview of Tracy Wolfe
USA00021871-22293
USA0022295-22300 ATF Brandon Testimony

USA0022301-22313 AFT Brandon Answers
USA0022314-22318 CJIS Lindquist Testimony
USA0022319-22323 AF Sec. Wilson Answers
USA0022324-22325 AF Testimony Sec. Wilson Testimony
USA0022625-22714 Notes from FBI Interview
USA0022907-23215 Notes from FBI Interview
USA00022326-22524 Family Advocacy Program Intake
USA00022715-22906 Invest Lead SA-19
USA00023216-23226
USA00023227-23400 Analysis Reports
USA00023401-23477 FBI Sutherland Springs Shooting 1A Leads Summary
USA00023478-23701 FBI Sutherland Springs Shooting Serial Attchmts
USA00023702-23964 FBI Unclassified
PEAK00000001-541 Peak Behavioral Health Svcs

Pleadings:

DKT #149 Stipulations

Documents Produced by Plaintiffs:

Video of Testimony before the Senate Judiciary Committee, 12/6/2017 (SSS-001112)

DOI: 10.1111/1745-9133.12475; Zeoli & Paruk, Potential to prevent mass shootings through domestic violence firearm restrictions (SSS-002667-002683)

Wright, et al., Effectiveness of Denial of Handgun Purchase to Persons Believed to Beat High Risk for Firearm Violence Expert (SSS-002684-002688)

Campbell, et al., Risk Factors for Femicide in Abusive Relationships: Results From a Multisite Case Control Study (SSS-002689-002719)

Bailey, et al., Risk Factors for Violent Death of Women in the Home (SSS-002720-002725)

Smith, et al., Intimate Partner Homicide and Corollary Victims in 16 States: National Violent Death Reporting System, 2003–2009 (SSS-002726-002731)

Wintemute, et al., Subsequent Criminal Activity Among Violent Misdemeanants Who Seek to Purchase Handguns (SSS-002732-002739)

Kellermann, et al., Gun Ownership as a Risk Factor for Homicide in the Home (SSS-002740-002747)

Jane Koziol-McLain, PhD, RN, Risk Factors for Femicide-Suicide in Abusive Relationships: Results From a Multisite Case Control Study (SSS-002748-002766)

Los Angeles Times, Op-Ed: We have studied every mass shooting since 1966. Here's what we've learned about the shooters (SSS-002767-002773)

Zeoli, et al., Analysis of the Strength of Legal Firearms Restrictions for Perpetrators of Domestic Violence and Their Associations With Intimate Partner Homicide (SSS-002774-002780)

Saltzman, et al., Weapon Involvement and Injury Outcomes in Family and Intimate Assaults (SSS-002781-002785)

Smucker, et al., Suicide and Additional Homicides Associated with Intimate Partner Homicide: North Carolina 2004–2013 (SSS-002786-002792)

Wintemute, et al., Suicide and Additional Homicides Associated with Intimate Partner Homicide: North Carolina 2004–2013 (SSS-002793-002797)

Wintemute, Background Checks For Firearm Purchases: Problem Areas And Recommendations To Improve Effectiveness (SSS-02798-002806)

The Violence Project Mass Shooter Database (SSS-002810)

What Explains U.S. Mass Shootings? – New York Times Article (SSS-002811-002814)

Documents Produced by Texas Rangers:

TXRANGERS00000048.pdf

TXRANGERS00000126.WAV

TXRANGERS00000141.WAV

TXRANGERS00006022-TXRANGERS00006023.pdf

TXRANGERS00006063.xlsx

TXRANGERS00006158.pdf

TXRANGERS00006168.pdf

TXRANGERS00006175.pdf

TXRANGERS00006183.pdf

TXRANGERS00006192.jpg

TXRANGERS00006203.pdf

TXRANGERS00006232.pdf

TXRANGERS00006400.pdf

TXRANGERS00006403-TXRANGERS00006404.pdf

TXRANGERS00006415.pdf
TXRANGERS00006484.jpg
TXRANGERS00006541.pdf
TXRANGERS00006556.pdf
TXRANGERS00006724.JPG
TXRANGERS00006725.pdf
TXRANGERS00006729.pdf
TXRANGERS00006731.pdf
TXRANGERS00006748-TXRANGERS00006749.pdf
TXRANGERS00006755.pdf
TXRANGERS00006773.pdf
TXRANGERS00006777.pdf
TXRANGERS00006842.pdf
TXRANGERS00006850.pdf
TXRANGERS00006866.pdf
TXRANGERS00006948.pdf
TXRANGERS00010925.MP3
TXRANGERS00010936.MP3
TXRANGERS00010939-TXRANGERS00010940.pdf
TXRANGERS00010942-TXRANGERS00010948.pdf
TXRANGERS00010951-TXRANGERS00010952.pdf
TXRANGERS00010957-TXRANGERS00010958.JPG
TXRANGERS00010965.JPG
TXRANGERS00010967-TXRANGERS00010972.JPG
TXRANGERS00013174-TXRANGERS00013175.JPG
TXRANGERS00013183.pdf
TXRANGERS00013230.pdf
TXRANGERS00013241.pdf
TXRANGERS00013443.pdf
TXRANGERS00013497.pdf

TXRANGERS00013807.pdf
TXRANGERS00013814.pdf
TXRANGERS00016636.pdf
TXRANGERS00016639-TXRANGERS00016655.pdf
TXRANGERS00016656.MP3
TXRANGERS00016681.JPG
TXRANGERS00016684-TXRANGERS00016685.JPG
TXRANGERS00016905.pdf
TXRANGERS00046827.JPG
TXRANGERS00046856.JPG
TXRANGERS00046864.JPG
TXRANGERS00046877-TXRANGERS00046878.JPG
TXRANGERS00046886.JPG
TXRANGERS00046900-TXRANGERS00046901.JPG
TXRANGERS00046915.JPG
TXRANGERS00047011.JPG
TXRANGERS00047046.JPG
TXRANGERS00048172-TXRANGERS00048173.pdf
TXRANGERS00048210-TXRANGERS00048211.pdf
TXRANGERS00048213.pdf
TXRANGERS00048216.pdf
TXRANGERS00048655.JPG
TXRANGERS00048827.pptx
TXRANGERS00049004.pdf
TXRANGERS00049089.pdf
TXRANGERS00049224.pdf
TXRANGERS00049323.pdf
TXRANGERS00049338.pdf
TXRANGERS00049353.pdf
TXRANGERS00049355.pdf

TXRANGERS00049380.pdf
TXRANGERS00049385.pdf
TXRANGERS00049417.pdf
TXRANGERS00053248.pdf
TXRANGERS00053377.pdf
TXRANGERS00053379.pdf
TXRANGERS00053381.pdf
TXRANGERS00053577.pdf
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TXRANGERS00053601.pdf
TXRANGERS00053607.pdf
TXRANGERS00053617.pdf
TXRANGERS00053631.pdf
TXRANGERS00053635.pdf
TXRANGERS00053638.pdf
TXRANGERS00053641.pdf
TXRANGERS00053649.pdf
TXRANGERS00053652.pdf
TXRANGERS00053663.pdf
TXRANGERS00053667.pdf
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TXRANGERS00053680.pdf
TXRANGERS00053688.pdf
TXRANGERS00053690.pdf
TXRANGERS00053694.pdf
TXRANGERS00053696.pdf

TXRANGERS00053710.pdf
TXRANGERS00053732.pdf
TXRANGERS00053734.pdf
TXRANGERS00053739.pdf
TXRANGERS00053741.pdf
TXRANGERS00053743.pdf
TXRANGERS00053746.pdf
TXRANGERS00053750.pdf
TXRANGERS00053752.pdf
TXRANGERS00053874.pdf
TXRANGERS00053902.MP3
TXRANGERS00055323.pdf
TXRANGERS00055325.pdf
TXRANGERS00055329.pdf
TXRANGERS00055330.pdf

For a more detailed discussion of his opinions and bases for those opinions, please see his report, which is attached as noted in the chart below and incorporated by reference into this designation. Plaintiffs also refer to and incorporate by reference Dr. Webster's deposition testimony taken in this case on August 12, 2020, including all exhibits thereto.

A list of the cases Dr. Webster has testified in either by deposition or trial, as well as his fee schedule, are attached as noted in the chart below and are incorporated by reference into this designation.

Dr. Webster reserves the right to use any exhibits previously produced by Plaintiffs, any part or part of his expert report or cited literature, any exhibits that have or will be exchanged in discovery, any documents produced by the United States in this litigation (USA00001-USA0032443 as of the date of this filing, plus

any additional documents to be produced), and all documents that he brought with him to his deposition and which were marked as exhibits to his deposition. Dr. Webster also reserves the right to use summary tables to describe his opinions.

Description	Type	Case #	Bates Beginning	Bates Ending
5:18-cv-0055 (SSS Common Documents)				
Webster Report	Expert	SSS	002290	002304
Webster CV	Expert	SSS	002305	002350
Webster Fee Schedule & Testimony List	Expert	SSS	002351	002351
<i>Webster Supplemental Declaration</i>	<i>Expert</i>	<i>SSS</i>	<i>002815</i>	<i>002826</i>

4. ***Jeffrey L. Metzner, M.D., P.C.***

Areas of Expertise: Clinical Psychiatry & Neurology, Clinical Psychiatry, Forensic Psychiatry

Expert Type: Rebuttal

Dr. Metzner has extensive experience in psychiatry including forensic psychiatry. He is a Clinical Professor and the Associate Director of the Forensic Psychiatry Fellowship Program with the Department of Psychiatry, at the University of Colorado School of Medicine. Dr. Metzner is also a Diplomate with the American Board of Psychiatry and Neurology and the American Board of Forensic Psychiatry. For a more detailed summary of Dr. Metzner's skills, training, education, experience, and knowledge, please see his curriculum vitae, which is attached as noted in the chart below and is incorporated

by reference into this designation.

Dr. Metzner will testify as to the forensic psychiatric aspects of the events and history leading up to the Sutherland Springs shooting and what consequences resulted from any acts or omissions of the United States Air Force (USAF) and DoD personnel involved in this matter, and related issues in this case for all Plaintiffs. He will testify to risk of harm and danger assessments from the psychiatric perspective. He will testify to any subject on which he has factual knowledge or is within his area of expertise. He will testify regarding any opinion or fact or issue raised by the Defendant, its employees, any of Defendant's witnesses, or any Defense expert within his area of expertise.

Dr. Metzner's opinions are based on reviews of evidence including selected Department of Defense (DoD) documents, DoD Inspector General (IG) reports, depositions and exhibits presented to the deposed witnesses in this case, and documents produced in this case, testimony taken and to be taken in this case, any specific literature he may have relied upon, and his education, training, and experience. See the records cited by Dr. Metzner in his report.

At this time, Plaintiffs have no further knowledge of the mental impressions, opinions and facts known to this expert other than those contained in his report. For a more detailed discussion of his opinions and bases for those opinions, please see his report, which is attached as noted in the chart below and incorporated by reference into this designation. Dr. Metzner is available for deposition and Defendant may examine him for a more detailed explanation of his opinions and basis for those opinions

relating to this case. Once he has given deposition or other testimony in this case, Plaintiffs incorporate such testimony by reference into this designation.

A list of the cases Dr. Meztner has testified in either by deposition or trial, as well as his fee schedule, are attached as noted in the chart below and are incorporated by reference into this designation. His fee schedule is also attached as noted in the chart below and are incorporated by reference into this designation.

Dr. Metzner reserves the right to use any exhibits previously produced by Plaintiffs, any part or part of his expert report or cited literature, any exhibits that have or will be exchanged in discovery, any documents produced by the United States in this litigation (USA00001-USA0032720 as of the date of this filing, plus any additional documents to be produced), and any documents that he brings with him to his deposition. Dr. Metzner also reserves the right to use summary tables to describe his opinions.

<i>Description</i>	<i>Type</i>	<i>Case #³</i>	<i>Bates Beginning</i>	<i>Bates Ending</i>
<i>5:18-cv-0055 (SSS Common Documents)</i>				
<i>Metzner Report, CV & Attachments</i>	<i>Expert</i>	<i>SSS</i>	<i>002827</i>	<i>002843</i>
<i>Metzner CV</i>	<i>Expert</i>	<i>SSS</i>	<i>002844</i>	<i>002860</i>

³ Documents Common to all Plaintiffs are referred to herein as “Common Documents” and bear the Bates number prefix: “SSS-”

<i>Description</i>	<i>Type</i>	<i>Case #³</i>	<i>Bates Beginning</i>	<i>Bates Ending</i>
<i>Metzner Testimony History</i>	<i>Expert</i>	<i>SSS</i>	<i>002861</i>	<i>002864</i>
<i>Metzner Fee Schedule</i>	<i>Expert</i>	<i>SSS</i>	<i>002865</i>	<i>002865</i>

Damages Expert Witnesses

5. Chester S. Gwin, III, M.D.

Areas of Expertise: Pathology, Cause and Manner of Death, and Conscious Pain and Suffering

Dr. Chester S. Gwin is a physician specializing in forensic pathology and is board certified in Anatomic and Forensic Pathology through the American Board of Pathology. Dr. Gwin holds current full and unrestricted medical licensure in Texas, Tennessee, and Maryland. Dr. Gwin obtained a B.S. in Biology from Southwestern Adventist University (1998), and an M.D. from Loma Linda University School of Medicine (2003). He completed Anatomic and Clinical Pathology residency at Mount Sinai Medical Center in Miami Beach, Florida (2003-2007) followed by a Forensic Pathology fellowship at the Miami-Dade Medical Examiner's Office in Miami, Florida (2007-2008). For a more detailed summary of Dr. Gwin's skills, training, education, experience, and knowledge, please see his curriculum vitae, which is attached as noted in the chart below and is incorporated by reference into this designation.

Dr. Gwin will testify as to any pathological, cause of death, manner of death, conscious pain and suffering, and related issues in this case for the Plaintiffs in the

cases identified below. He will testify to any subject on which he has factual knowledge or is within his area of expertise. He will testify regarding any opinion or fact or issue raised by the Defendant, its employees, any of Defendant's witnesses, or any Defense expert within his area of expertise.

Dr. Gwin's opinions are based on reviews of evidence including the video of the shooting, scene photographs, autopsy reports, autopsy photographs, statements from the survivors of the shooting, medical illustrations of the decedents' injuries, testimony taken and to be taken in this case, any specific literature he may have relied upon, and his education, training, and experience.

At this time, Plaintiffs have no further knowledge of the mental impressions, opinions and facts known to this expert other than those contained in his reports. For a more detailed discussion of his opinions and bases for those opinions, please see his reports, which are attached as noted in the chart below and are incorporated by reference into this designation. Dr. Gwin is available for deposition and Defendant may examine him for a more detailed explanation of his opinions and basis for those opinions relating to this case. Once he has given deposition or other testimony in this case, Plaintiffs incorporate such testimony by reference into this designation.

A list of the cases Dr. Gwin has testified in either by deposition or trial, as well as his fee schedule, are attached as noted in the chart below and are incorporated by reference into this designation.

Dr. Gwin reserves the right to use any exhibits previously produced by Plaintiffs, any part or part of his expert report or cited literature, any exhibits that have or will be exchanged in discovery, and any documents that he brings with him to his deposition. Dr. Gwin also reserves the right to use summary tables to describe his opinions.

Description	Type	Case #	Bates Beginning	Bates Ending
5:18-cv-00555 (Holcombe)				
Gwin Report	Expert	18-555	000203	000211
Gwin CV	Expert	18-555	000212	000213
Gwin Fee Schedule	Expert	18-555	000214	000214
Gwin Testimony List	Expert	18-555	000215	000216
John Bryan Holcombe Illustration	Expert	18-555	000217	000217
5:18-cv-00881 (Uhl)				
Gwin Report (HK)	Expert	18-881	033187	033195
HK Illustration	Expert	18-881	033196	033196
Gwin CV	Expert	18-881	033197	033198
Gwin Fee Schedule	Expert	18-881	033199	033199
Gwin Testimony List	Expert	18-881	033200	033201
5:18-cv-00944 (Ramsey)				
Gwin Report	Expert	18-944	000099	000106
Gwin CV	Expert	18-944	000107	000108
Gwin Testimony List	Expert	18-944	000109	000110
Gwin Fee Schedule	Expert	18-944	000111	000111
John Bryan Holcombe Illustration	Expert	18-944	000112	000112
5:18-cv-00949 (McNulty)				
Gwin Report (Tara McNulty)	Expert	18-949	004695	004702
Gwin CV	Expert	18-949	004703	004704

Description	Type	Case #	Bates Beginning	Bates Ending
Gwin Fee Schedule	Expert	18-949	004705	004705
Gwin Testimony List	Expert	18-949	004706	004707
5:18-cv-00951 (Wall)				
Gwin Report (Dennis Johnson)	Expert	18-951	000412	000420
Gwin Report (Sara Johnson)	Expert	18-951	000421	000428
Gwin CV	Expert	18-951	000429	000430
Gwin Fee Schedule	Expert	18-951	000431	000431
Gwin Testimony List	Expert	18-951	000432	000433
5:18-cv-01151 (Amador)				
Gwin Report (Richard Cardona Rodriguez) with R. Rodriguez Illustration	Expert	18-1151	001970	001978
Gwin CV	Expert	18-1151	001979	001980
Gwin Fee Schedule	Expert	18-1151	001981	001981
Gwin Testimony List	Expert	18-1151	001982	001983
5:19-cv-00691 (Braden)				
Estate of Keith Braden				
Gwin Report (Keith Braden)	Expert	KBRADEN-19-691	000395	000402
Gwin CV	Expert	KBRADEN-19-691	000403	000404
Gwin Testimony List	Expert	KBRADEN-19-691	000405	000406
Gwin Fee Schedule	Expert	KBRADEN-19-691	000407	000407

Description	Type	Case #	Bates Be- ginning	Bates Ending
Elizabeth Braden				
Gwin Report (Keith Braden)	Expert	EBRADEN-19-691	000604	000611
Gwin CV	Expert	EBRADEN-19-691	000612	000613
Gwin Testimony List	Expert	EBRADEN-19-691	000614	000615
Gwin Fee Schedule	Expert	EBRADEN-19-691	000616	000616
Estate of Robert Corrigan				
Gwin Report (R. Corrigan)	Expert	RCORRI-GAN-19-691	000826	000834
Gwin CV	Expert	RCORRI-GAN-19-691	000835	000836
Gwin Testimony List	Expert	RCORRI-GAN-19-691	000837	000838
Gwin Fee Schedule	Expert	RCORRI-GAN-19-691	000839	000839
Estate of Shani Corrigan				
Gwin Report (R. Corrigan)	Expert	SCORRI-GAN-19-691	000549	000556
Gwin CV	Expert	SCORRI-GAN-19-691	000557	000558
Gwin Testimony List	Expert	SCORRI-GAN-19-691	000559	000560
Gwin Fee Schedule	Expert	SCORRI-GAN-19-691	000561	000561
Estate of Robert Marshall				

Description	Type	Case #	Bates Beginning	Bates Ending
Gwin Report (R. Marshall)	Expert	RMAR-SHALL-19-691	000431	000440
Gwin CV	Expert	RMAR-SHALL-19-691	000441	000442
Gwin Testimony List	Expert	RMAR-SHALL-19-691	000443	000444
Gwin Fee Schedule	Expert	RMAR-SHALL-19-691	000445	000445
Estate of Karen Marshall				
Gwin Report (K. Marshall)	Expert	KMAR-SHALL-19-691	000439	000446
Gwin CV	Expert	KMAR-SHALL-19-691	000447	000448
Gwin Testimony List	Expert	KMAR-SHALL-19-691	000449	000450
Gwin Fee Schedule	Expert	KMAR-SHALL-19-691	000451	000451
Estate of Peggy Warden				
Gwin Report (P. Warden)	Expert	PWARDEN-19-691	000388	000395
Gwin CV	Expert	PWARDEN-19-691	000396	000397

Description	Type	Case #	Bates Beginning	Bates Ending
Gwin Testimony List	Expert	PWARDEN-19-691	000398	000399
Gwin Fee Schedule	Expert	PWARDEN-19-691	000400	000400
5:19-cv-00706 (Lookingbill)				
Gwin Rpt (E.G.)	Expert	19-706	001714	001722
Gwin Testimony List	Expert	19-706	001723	001724
Gwin CV	Expert	19-706	001725	001726
Gwin Fee Schedule	Expert	19-706	001727	001727
E.G. Medical Illustration	Expert	19-706	001729	001729
5:19-cv-01318 (Holcombe II)				
John Bryan Holcombe Illustration	Expert	19-1318	000181	000181
John Porter Holcombe Illustration	Expert	19-1318	000182	000182
Karla Holcombe Illustration	Expert	19-1318	000183	000183
Crystal Holcombe Illustration	Expert	19-1318	000184	000184
Gwin Report (Crystal Holcombe)	Expert	19-1318	000189	000197
Gwin Report (John Bryan Holcombe)	Expert	19-1318	000198	000206
Gwin Report (Karla Holcombe)	Expert	19-1318	000207	000214
Gwin CV	Expert	19-1318	000215	000216
Gwin Fee Schedule	Expert	19-1318	000217	000217

Description	Type	Case #	Bates Be- ginning	Bates Ending
Gwin Testimony List	Expert	19-1318	000218	000219
5:20-cv-00109-XR (Braden II)				
5:20-cv-00368 (John Porter Holcombe ANF/Ind Admin Hill Children)				
Gwin Report [Crystal Hol- combe]	Expert	20-368	000439	000447
Gwin Report [ERH]	Expert	20-368	000448	000455
Gwin Report [GLH]	Expert	20-368	000456	000465
Gwin Report [John Bryan Holcombe]	Expert	20-368	000466	000474
Gwin Report [Karla Hol- combe]	Expert	20-368	000475	000482
Gwin Report [MGH]	Expert	20-368	000483	000490
Gwin CV	Expert	20-368	000491	000492
Gwin Fee Schedule	Expert	20-368	000493	000493
Gwin Testimony List	Expert	20-368	000494	000495
Crystal Holcombe Illustra- tion	Expert	20-368	000496	000496
ERH Illustration	Expert	20-368	000497	000497
GLH Illustration	Expert	20-368	000499	000499
John Bryan Holcombe Il- lustration	Expert	20-368	000500	000500
Karla Holcombe Illustra- tion	Expert	20-368	000502	000502
MGH Illustration	Expert	20-368	000503	000503

6. H. David Feltoon, Ph.D.

Area of Expertise: Clinical psychology

Dr. David Feltoon has a Ph.D. in clinical psychology. Dr. Feltoon serves as a clinical psychology expert. Dr. Feltoon earned his doctoral degree from Texas Tech University, his Master of Science from Trinity University, and his Bachelor of Arts in Psychology from University of Delaware. Dr. Feltoon performed his internship in Clinical Psychology at University of Texas Health Science Center at San Antonio. For a more detailed summary of Dr. Feltoon's skills, training, education, experience, and knowledge, please see his curriculum vitae that is attached as noted in the chart below and is incorporated by reference into this designation.

Dr. Feltoon will testify as to any psychological issues in this case for the Plaintiffs in the cases identified below. He will testify to any subject on which he has factual knowledge or is within his area of expertise. He will testify regarding any opinion or fact or issue raised by the Defendant, its employees, any of Defendant's witnesses, or any Defense expert within his area of expertise.

His opinions are based on an interview and evaluation of the Plaintiffs as identified in the re-ports referenced in the chart below, which also reference the records he reviewed, such as Plaintiffs' health care records, testimony taken and to be taken in this case, any specific literature he may have relied upon, and his education, training, and experience.

At this time, Plaintiffs have no further knowledge of the mental impressions, opinions and facts known to this expert other than those contained in his reports. For a more detailed discussion of his opinions and bases for those opinions, please see his reports, which are attached as noted in the chart below and are incorporated

by reference into this designation. Dr. Feltoon is available for deposition and Defendant may examine him for a more detailed explanation of his opinions and basis for those opinions relating to this case. Once he has given deposition or other testimony in this case, Plaintiffs incorporate such testimony by reference into this designation.

A list of the cases Dr. Feltoon has testified in either by deposition or trial, as well as his fee schedule, are attached as noted in the chart below and are incorporated by reference into this designation.

Dr. Feltoon reserves the right to use any exhibits previously produced by Plaintiffs, any part or part of his expert report or cited literature, any exhibits that have or will be exchanged in discovery, and any documents that he brings with him to his deposition. Dr. Feltoon also reserves the right to use summary tables to describe his opinions.

Description	Type	Case #	Bates Beginning	Bates Ending
5:18-cv-00712 (Vidal)				
Feltoon Report (Margarette Vidal)	Expert	18-712	006852	006857
Feltoon CV	Expert	18-712	006858	006866
Feltoon Fee Schedule	Expert	18-712	006867	006867
Feltoon Testimony List	Expert	18-712	006868	006869
5:18-cv-00881 (Uhl)				
Feltoon Report (Charlene Uhl)	Expert	18-881	033169	033174
Feltoon CV	Expert	18-881	033175	033183

Description	Type	Case #	Bates Be- ginning	Bates Ending
Feltoon Fee Schedule	Expert	18-881	033184	033184
Feltoon Testimony List	Expert	18-881	033185	033186
5:18-cv-00949 (McNulty)				
Feltoon Report (HM)	Expert	18-949	004502	004507
Feltoon Report (JM)	Expert	18-949	004508	004514
Feltoon Report (Lisa McNulty)	Expert	18-949	004515	004519
Feltoon CV	Expert	18-949	004520	004528
Feltoon Fee Schedule	Expert	18-949	004529	004529
Feltoon Testimony List	Expert	18-949	004530	004531
5:18-cv-01151 (Amador)				
Feltoon Report (Jose Rodriguez)	Expert	18-1151	001947	001951
Feltoon Report (Regina Rodriguez)	Expert	18-1151	001952	001957
Feltoon CV	Expert	18-1151	001958	001966
Feltoon Fee Schedule	Expert	18-1151	001967	001967
Feltoon Testimony List	Expert	18-1151	001968	001969
5:19-cv-00289 (Ward)				
Feltoon Report (C. Ward)	Expert	19-289	008411	008416
Feltoon Report (R.W.)	Expert	19-289	008417	008423
Feltoon CV	Expert	19-289	008424	008432
Feltoon Fee Schedule	Expert	19-289	008433	008433
Feltoon Testimony List	Expert	19-289	008434	008435
5:19-cv-00691 (Braden)				

Description	Type	Case #	Bates Be- ginning	Bates Ending
Deborah Braden				
Feltoon Report (Deborah Braden)	Expert	DBRADEN -19-691	002930	002936
Feltoon CV	Expert	DBRADEN -19-691	002937	002945
Feltoon Testimony List	Expert	DBRADEN -19-691	002946	002947
Feltoon Fee Schedule	Expert	DBRADEN -19-691	002948	002948
Elizabeth Braden				
Feltoon Report (E. Braden)	Expert	EBRADEN -19-691	000617	000623
Feltoon CV	Expert	EBRADEN -19-691	000624	000632
Feltoon Testimony List	Expert	EBRADEN -19-691	000633	000634
Feltoon Fee Schedule	Expert	EBRADEN -19-691	000635	000635
Benjamin Corrigan				
Feltoon Report (B. Corri- gan)	Expert	BCORRI- GAN-19- 691	000444	000449
Feltoon CV	Expert	BCORRI- GAN-19- 691	000450	000458
Feltoon Testimony List	Expert	BCORRI- GAN-19- 691	000459	000460

Description	Type	Case #	Bates Be- ginning	Bates Ending
Feltoon Fee Schedule	Expert	BCORRI- GAN-19- 691	000461	000461
Estate of Robert Corrigan				
Preston Corrigan				
Feltoon Report (B. Corri- gan)	Expert	PCORRI- GAN-19- 691	000627	000632
Feltoon CV	Expert	PCORRI- GAN-19- 691	000633	000641
Feltoon Testimony List	Expert	PCORRI- GAN-19- 691	000642	000643
Feltoon Fee Schedule	Expert	PCORRI- GAN-19- 691	000644	000644
Kara Boyd				
Feltoon Report (K. Boyd)	Expert	KBOYD-19- 691	000158	000163
Feltoon CV	Expert	KBOYD-19- 691	000164	000172
Feltoon Testimony List	Expert	KBOYD-19- 691	000173	000174
Feltoon Fee Schedule	Expert	KBOYD-19- 691	000175	000175
Martina Pachel				
Feltoon Report M. Pachal)	Expert	MPACHEL -19-691	000444	000448

Description	Type	Case #	Bates Be- ginning	Bates Ending
Feltoon CV	Expert	MPACHEL -19-691	000449	000457
Feltoon Testimony List	Expert	MPACHEL -19-691	000458	000459
Feltoon Fee Schedule	Expert	MPACHEL -19-691	000460	000460
Zachary Poston				
Feltoon Report (Z. Poston)	Expert	ZPOSTON- 19-691	003942	003947
Feltoon CV	Expert	ZPOSTON- 19-691	003948	003956
Feltoon Testimony List	Expert	ZPOSTON- 19-691	003957	003958
Feltoon Fee Schedule	Expert	ZPOSTON- 19-691	003959	003959
Jennifer Racey				
Feltoon Report (J. Racey)	Expert	JRACEY- 19-691	000296	000301
Feltoon CV	Expert	JRACEY- 19-691	000302	000310
Feltoon Testimony List	Expert	JRACEY- 19-691	000311	000312
Feltoon Fee Schedule	Expert	JRACEY- 19-691	000313	000313
Patsy McCain				
Feltoon Report (P. McCain)	Expert	PMcCAIN- 19-691	000326	000331
Feltoon CV	Expert	PMcCAIN- 19-691	000332	000340

Description	Type	Case #	Bates Be- ginning	Bates Ending
Feltoon Testimony List	Expert	PMcCAIN- 19-691	000341	000342
Feltoon Fee Schedule	Expert	PMcCAIN- 19-691	000343	000343
Elizabeth Braden obo Z.Z.				
Feltoon Report (Z.Z.)	Expert	ZZAVALA- 19-691	010957	010963
Feltoon CV	Expert	ZZAVALA- 19-691	010964	010972
Feltoon Testimony List	Expert	ZZAVALA- 19-691	010973	010974
Feltoon Fee Schedule	Expert	ZZAVALA- 19-691	010975	010975
5:19-cv-00706 (Lookingbill)				
Feltoon Rpt (D. Lookingbill)	Expert	19-706	001690	001694
Feltoon Rpt (R.T.)	Expert	19-706	001695	001701
Feltoon CV	Expert	19-706	001702	001710
Feltoon Fee Schedule	Expert	19-706	001711	001711
Feltoon Testimony List	Expert	19-706	001712	001713
5:19-cv-00714 (Solis)				
Feltoon Report (Joaquin Ramirez)	Expert	19-714	001211	001216
Feltoon Report (Rosanne Solis)	Expert	19-714	001217	001222
Feltoon CV	Expert	19-714	001223	001231
Feltoon Fee Schedule	Expert	19-714	001232	001232
Feltoon Testimony List	Expert	19-714	001233	001234

Description	Type	Case #	Bates Be- ginning	Bates Ending
5:19-cv-00715 (McKenzie)				
Feltoon Report (Margaret McKenzie)	Expert	19-715	000887	000892
Feltoon CV	Expert	19-715	000893	000901
Feltoon Fee Schedule	Expert	19-715	000902	000902
Feltoon Testimony List	Expert	19-715	000903	000904
5:19-cv-00972 (McMahan)				
Chancie McMahan				
Feltoon Report (C. McMahan)	Expert	McMAHAN 19-972	008241	008246
Feltoon Report (R. Ward)	Expert	McMAHAN 19-972	008247	008253
Feltoon CV	Expert	McMAHAN 19-972	008254	008262
Feltoon Fee Schedule	Expert	McMAHAN 19-972	008263	008263
Feltoon Testimony List	Expert	McMAHAN 19-972	008264	008265
5:20-cv-00109-XR (Braden II)				
Robert Braden				
Feltoon Report (R. Braden)	Expert	RBRADEN -20-109	000317	000322
Feltoon CV	Expert	RBRADEN -20-109	000323	000331
Feltoon Testimony List	Expert	RBRADEN -20-109	000332	000333

Description	Type	Case #	Bates Be- ginning	Bates Ending
Feltoon Fee Schedule	Expert	RBRADEN -20-109	000334	000334
Rebecca Metcalf Braden				
Feltoon Report (R. Metcalf)	Expert	RMETCAL F-20-109	000124	000129
Feltoon CV	Expert	RMETCAL F-20-109	000130	000138
Feltoon Testimony List	Expert	RMETCAL F-20-109	000139	000140
Feltoon Fee Schedule	Expert	RMETCAL F-20-109	000141	000141
Brenda Moulton				
Feltoon Report (B. Moulton)	Expert	BMOULTO N-20-109	003008	003013
Feltoon CV	Expert	BMOULTO N-20-109	003014	003022
Feltoon Testimony List	Expert	BMOULTO N-20-109	003023	003024
Feltoon Fee Schedule	Expert	BMOULTO N-20-109	003025	003025

7. Joe G. Gonzales, MD, FAAPMR, CLCP, CPLCP

Areas of Expertise: Life Care Planning, Physical Medicine and Rehabilitation

Dr. Joe G. Gonzales is a triple-board-certified Physician, holding board certifications from the American Board of Physical Medicine & Rehabilitation, the American Board of Pain Medicine, and the American College of Occupational & Environmental Medicine. He is a Certified Life Care Planner and a Certified Physician Life

Care Planner. Dr. Gonzales earned his medical degree from Texas Tech University Health Science Center, and his Bachelor of Health Science degree from Baylor College of Medicine. Dr. Gonzales performed his internship in the department of Family Medicine at Texas Tech University Health Science Center in Lubbock, Texas. Dr. Gonzales performed his residency in Physical Medicine & Rehabilitation at the University of Texas Health Science Center at San Antonio. For a more detailed summary of Dr. Gonzales' skills, training, education, experience, and knowledge, please see his curriculum vitae, which is attached as noted in the chart below and is incorporated by reference into this designation.

Dr. Gonzales will testify as to any rehabilitation and life care planning issues in this case for the Plaintiffs in the cases identified below. He will testify to any subject on which he has factual knowledge or is within his area of expertise. He will testify regarding any opinion or fact or issue raised by the Defendant, its employees, any of Defendant's witnesses, or any Defense expert within his area of expertise.

His opinions are based on an interview, evaluation, and physical examination of the Plaintiffs as identified in the reports referenced in the chart below, and a review of the Plaintiffs' health care records, testimony taken and to be taken in this case, any specific literature he may have relied upon, and his education, training, and experience.

At this time, Plaintiffs have no further knowledge of the mental impressions, opinions and facts known to this expert other than those contained in his reports. For a more detailed discussion of his opinions and bases for those opinions, please see his reports, which are attached as noted in the chart below and are incorporated by reference into this designation. Dr. Gonzales is available for deposition and Defendant may examine him for a more detailed explanation of his opinions and basis

for those opinions relating to this case. Once he has given deposition or other testimony in this case, Plaintiffs incorporate such testimony by reference into this designation.

A list of the cases Dr. Gonzales has testified in either by deposition or trial, as well as his fee schedule, are attached as noted in the chart below and are incorporated by reference into this designation.

Dr. Gonzales reserves the right to use any exhibits previously produced by Plaintiffs, any part or part of his expert report or cited literature, any exhibits that have or will be exchanged in discovery, and any documents that he brings with him to his deposition. Dr. Gonzales also reserves the right to use summary tables to describe his opinions. Dr. Gonzales may also use the photos and videos taken by him or his staff which are produced as part of the reports referenced below. Including the documents cited in his report, Dr. Gonzalez may testify on the following documents, which are publicly available:

- CDC Life Tables, available at https://www.cdc.gov/nchs/products/life_tables.htm
- Nolte, Ellen, et al. "The contribution of medical care to changing life expectancy in Germany and Poland." Social science & medicine 55.11 (2002): 1905-1921.

Description	Type	Case #	Bates Beginning	Bates Ending
5:18-cv-00712 (Vidal)				
Gonzales Life Care Plan (Margarette Vidal)	Expert	18-712	006870	006957
Gonzales CV	Expert	18-712	006958	006964

Description	Type	Case #	Bates Begin- ning	Bates Ending
Gonzales Fee Schedule	Expert	18-712	006965	006974
Gonzales Testimony List	Expert	18-712	006975	006988
5:18-cv-00949 (McNulty)				
Gonzales Life Care Plan (HM)	Expert	18-949	004532	004593
Gonzales Life Care Plan (JM)	Expert	18-949	004594	004653
Gonzales CV	Expert	18-949	004654	004660
Gonzales Fee Schedule (HM)	Expert	18-949	004661	004670
Gonzales Fee Schedule (JM)	Expert	18-949	004671	004680
Gonzales Testimony List	Expert	18-949	004681	004694
5:19-cv-00184 (Brown)				
Dr. Gonzales – CV	Expert	19-184	001681	001687
Dr. Gonzales Invoice	Expert	19-184	001697	001697
Dr. Gonzales Life Care Plan [F. Brown]	Expert	19-184	001698	001759
Dr. Gonzales Expert Appear- ances	Expert	19-184	001815	001828
5:19-cv-00691 (Braden)				
Deborah Braden				
Gonzales Life Care Plan - D. Braden	Expert	DBRADEN- 19-691	002949	003026
Medical Narrative - D. Braden	Expert	DBRADEN- 19-691	003027	003028
Gonzales - CV	Expert	DBRADEN- 19-691	003029	003035

Description	Type	Case #	Bates Begin- ning	Bates Ending
Gonzales Testimony List	Expert	DBRADEN- 19-691	003036	003049
PLCP Retention Agreement (Case- Deborah Braden)	Expert	DBRADEN- 19-691	003050	003059
Zachary Poston				
Gonzales Life Care Plan (Z. Poston)	Expert	ZPOSTON- 19-691	003960	004061
Medical Narrative (Z. Poston)	Expert	ZPOSTON- 19-691	004062	004063
Gonzales CV	Expert	ZPOSTON- 19-691	004064	004070
Gonzales Testimony List	Expert	ZPOSTON- 19-691	004071	004084
PLCP Retention Agreement (Z. Poston)	Expert	ZPOSTON- 19-691	004085	004094
Elizabeth Braden obo Z.Z.				
Gonzales Life Care Plan (Z.Z.)	Expert	ZZAVALA-19- 691	010976	011079
Medical Narrative (Z.Z.)	Expert	ZZAVALA-19- 691	011080	011081
Gonzales CV	Expert	ZZAVALA-19- 691	011082	011088
Gonzales Testimony List	Expert	ZZAVALA-19- 691	011089	011102
PLCP Retention Agmt (Z.Z.)	Expert	ZZAVALA-19- 691	011103	001112
5:19-cv-00705 (Kyle Workman & Morgan Harris)				
Kyle Workman				

Description	Type	Case #	Bates Begin- ning	Bates Ending
Morgan Harris				
Gonzales Life Care Plan [M. Harris]	Expert	MHARRIS-19-705	000657	000719
Amended Life Care Plan - M. Harris	Expert	MHARRIS-19-705	000857	000896
Gonzales CV	Expert	MHARRIS-19-705	000897	000903
Gonzales Testimony List	Expert	MHARRIS-19-705	000904	000909
5:19-cv-00706 (Lookingbill)				
Gonzales Life Care Plan (D. Lookingbill)	Expert	19-706	001733	001766
Gonzales Life Care Plan (R.T.)	Expert	19-706	001767	001800
Gonzales CV	Expert	19-706	001801	001807
Gonzales Testimony List	Expert	19-706	001808	001813
Gonzales Fee Agreement (R.T.)	Expert	19-706	001814	001823
Gonzales Fee Agreement (D. Lookingbill)	Expert	19-706	001824	001833
5:19-cv-00714 (Solis)				
Gonzales Life Care Plan (Joaquin Ramirez)	Expert	19-714	001235	001281
Gonzales Life Care Plan (Rosanne Solis)	Expert	19-714	001282	001340
Gonzales CV	Expert	19-714	001341	001347

Description	Type	Case #	Bates Begin- ning	Bates Ending
Gonzales Fee Schedule (Joaquin Ramirez)	Expert	19-714	001348	001357
Gonzales Fee Schedule (Ro- sanne Solis)	Expert	19-714	001358	001367
Gonzales Testimony List	Expert	19-714	001368	001381
5:19-cv-00715 (McKenzie)				
Gonzales Life Care Plan (Margaret McKenzie)	Expert	19-715	000905	000962
Gonzales CV	Expert	19-715	000963	000969
Gonzales Fee Schedule	Expert	19-715	000970	000979
Gonzales Testimony List	Expert	19-715	000980	000993
5:19-cv-00806 (Macias)				
Gonzales Life Care Plan (Juan Macias)	Expert	19-806	014095	014230
Gonzales CV	Expert	19-806	014231	014237
Gonzales Retention Agree- ment	Expert	19-806	014238	014247
Gonzales Testimony List	Expert	19-806	014248	014253
Juan Macias Illustration	Expert	19-806	014254	014254
5:20-cv-00109-XR (Braden II)				
Brenda Moulton				
Gonzales Life Care Plan (B. Moulton)	Expert	BMOULTON- 20-109	003026	003117
Medical Narrative (B. Moulton)	Expert	BMOULTON- 20-109	003118	003119

Description	Type	Case #	Bates Begin- ning	Bates Ending
Gonzales CV	Expert	BMOULTON- 20-109	003120	003126
Gonzales Testimony List	Expert	BMOULTON- 20-109	003127	003140
Gonzales Retention Agree- ment (B. Moulton)	Expert	BMOULTON- 20-109	003141	003150

8. Gerald Casenave, Ph.D.

Areas of Expertise: Vocational Economics and Rehabilitation Counseling

Dr. Gerald Casenave is board-certified in Psychological Disabilities Evaluation by the American College of Forensic Examiners. He is a Licensed Psychologist in the State of Texas and a Certified Rehabilitation Counselor. Dr. Casenave earned a Ph.D. in Clinical Psychology University of Texas Southwestern Medical Center from Dallas, Texas, an M.S. in Rehabilitation Counseling from Southern Illinois University, a B.A. in Philosophy from Pomona College, Claremont, California, both an M.A. and a Ph.D. in Philosophy from Vanderbilt University, conducted post-doctoral studies at University of Nevada at Las Vegas in Business Valuation, Principles of Economics for Occupational Professionals, and Applied Economics for Vocational Rehabilitation Professionals, and has attended 450 hours in a Psychopharmacology Post-Doctoral Training Program at Texas A & M University. For a more detailed summary of Dr. Casenave's skills, training, education, experience, and knowledge, please see his curriculum vitae, which is attached as noted in the chart below and is incorporated by reference into this designation.

Dr. Casenave will testify as to any vocational economic assessments, vocational rehabilitation, and related issues in this case for the Plaintiffs in the cases identified below. He will testify to any subject on which he has factual knowledge or is within his area of expertise. He will testify regarding any opinion or fact or issue raised by the Defendant, its employees, any of Defendant's witnesses, or any Defense expert within his area of expertise.

His opinions are based on interviews with Plaintiffs and review of documents related to his areas of expertise, such as medical records, Social Security earnings history, W-2's, tax returns, which are identified in the reports referenced in the chart below, testimony taken and to be taken in this case, any specific literature he may have relied upon, and his education, training, and experience.

At this time, Plaintiffs have no further knowledge of the mental impressions, opinions and facts known to this expert other than those contained in his reports. For a more detailed discussion of his opinions and bases for those opinions, please see his reports, which are attached as noted in the chart below and are incorporated by reference into this designation. Dr. Casenave is available for deposition and Defendant may examine him for a more detailed explanation of his opinions and basis for those opinions relating to this case. Once he has given deposition or other testimony in this case, Plaintiffs incorporate such testimony by reference into this designation.

A list of the cases Dr. Casenave has testified in either by deposition or trial, as well as his fee schedule, are attached as noted in the chart below and are incorporated by reference into this designation.

Dr. Casenave reserves the right to use any exhibits previously produced by Plaintiffs, any part or part of his expert report or cited literature, any exhibits that

have or will be exchanged in discovery, and any documents that he brings with him to his deposition. Dr. Casenave also reserves the right to use summary tables to describe his opinions. Dr. Casenave may also use the photos and videos taken by him or his staff which are produced as part of the reports referenced below.

Description	Type	Case #	Bates Beginning	Bates Ending
5:19-cv-00691 (Braden)				
Estate of Keith Braden				
Casanave Report (Keith Braden)	Expert	KBRADEN-19-691	000266	000301
Casenave CV	Expert	KBRADEN-19-691	000302	000313
Casenave Testimony List	Expert	KBRADEN-19-691	000314	000351
Casenave Fee Agreement	Expert	KBRADEN-19-691	000352	000353
Elizabeth Braden				
Casenave Report (Keith Braden)	Expert	EBRADEN-19-691	000475	000510
Casenave CV	Expert	EBRADEN-19-691	000511	000522
Casenave Testimony List	Expert	EBRADEN-19-691	000523	000560
Casenave Fee Agmnt	Expert	EBRADEN-19-691	000561	000562
Estate of Robert Corrigan				
Casenave Report (Robert Corrigan)	Expert	RCORRIGAN-19-691	000699	000734

Description	Type	Case #	Bates Beginning	Bates Ending
Casenave CV	Expert	RCORRI- GAN-19-691	000735	000746
Casenave Testimony List	Expert	RCORRI- GAN-19-691	000747	000784
Casenave Fee Agreement	Expert	RCORRI- GAN-19-691	000785	000786
Estate of Shani Corrigan				
Casenave Report (Robert Corrigan)	Expert	SCORRI- GAN-19-691	000422	000457
Casenave CV	Expert	SCORRI- GAN-19-691	000458	000469
Casenave Testimony List	Expert	SCORRI- GAN-19-691	000470	000507
Casenave Fee Agreement	Expert	SCORRI- GAN-19-691	000508	000509
Estate of Robert Marshall				
Casenave Report (R. Marshall)	Expert	RMAR- SHALL-19- 691	000304	000339
Casenave CV	Expert	RMAR- SHALL-19- 691	000340	000351
Casenave Testimony List	Expert	RMAR- SHALL-19- 691	000352	000389
Casenave Fee Agreement	Expert	RMAR- SHALL-19- 691	000390	000391
Estate of Karen Marshall				

Description	Type	Case #	Bates Beginning	Bates Ending
Casenave Report (K. Marshall)	Expert	KMAR-SHALL-19-691	000312	000347
Casenave CV	Expert	KMAR-SHALL-19-691	000348	000359
Casenave Testimony List	Expert	KMAR-SHALL-19-691	000360	000397
Casenave Fee Agreement	Expert	KMAR-SHALL-19-691	000398	000399
Zachary Poston				
Casenave Report (Z. Poston)	Expert	ZPOSTON-19-691	003684	003720
Casenave CV	Expert	ZPOSTON-19-691	003721	003732
Casenave Testimony List	Expert	ZPOSTON-19-691	003733	003770
Casenave Fee Schedule	Expert	ZPOSTON-19-691	003771	003772
Estate of Peggy Warden				
Casenave Report (P. Warden)	Expert	PWARDEN-19-691	000269	000304
Casenave CV	Expert	PWARDEN-19-691	000305	000316
Casenave Testimony List	Expert	PWARDEN-19-691	000317	000354
Casenave Fee Agreement	Expert	PWARDEN-19-691	000355	000356

Description	Type	Case #	Bates Beginning	Bates Ending
Elizabeth Braden obo Z.Z.				
Casenave Report (Z. Zavala)	Expert	ZZAVALA-19-691	010686	010722
Casenave CV	Expert	ZZAVALA-19-691	010723	010734
Casenave Testimony List	Expert	ZZAVALA-19-691	010735	010772
Casenave Fee Agmnt	Expert	ZZAVALA-19-691	010773	010774

9. Keith Wm. Fairchild, Ph.D.

Areas of Expertise: Economics and Finance

Keith Wm. Fairchild, Ph.D. is an expert in economic and financial analysis. He received his doctoral degree in finance from the University of Texas at Austin. Dr. Fairchild is a recently retired Professor of Finance at the University of Texas at San Antonio, having held several distinguished positions during his tenure, including Director of Entrepreneurship Programs, Acting Associate Dean of Graduate Studies and Research, Department Chair, and Director of the MBA Program. For a more detailed summary of Dr. Fairchild's skills, training, education, experience, and knowledge, please see his curriculum vitae that is attached as noted in the chart below and is incorporated by reference into this designation.

Dr. Fairchild will testify as to any economic or financial in this case for the Plaintiffs in the cases identified below. He will testify as to any subject on which he has factual knowledge or is within his area of expertise. He will testify regarding

any opinion or fact or issue raised by the Defendant, its employees, any of Defendant's witnesses, or any Defense expert within his area of expertise. His expected testimony will address damage issues surrounding the facts that are the subject of this lawsuit. His opinions are based on a review of testimony taken and to be taken in this case, a list of documents described in his expert report, any specific literature he may have relied upon, and his education, training, skills, knowledge and experience including the documents attached to Dr. Fairchild's reports. Dr. Fairchild has reviewed the materials listed in his reports.

At this time, Plaintiffs have no further knowledge of the mental impressions, opinions and facts known to this expert other than those contained in his reports. For a more detailed discussion of his opinions and bases for those opinions, please see his reports, which are attached as noted in the chart below and are incorporated by reference into this designation. Dr. Fairchild is available for deposition and Defendant may examine him for a more detailed explanation of his opinions and basis for those opinions relating to this case. Once he has given deposition or other testimony in this case, Plaintiffs incorporate such testimony by reference into this designation.

A list of the cases Dr. Fairchild has testified in either by deposition or trial, as well as his fee schedule, are attached as noted in the chart below and are incorporated by reference into this designation.

Dr. Fairchild reserves the right to use any exhibits previously produced by Plaintiffs, any part or part of his expert report or cited literature, any exhibits that have or will be exchanged in discovery, and any documents that he brings with him to his deposition. Dr. Fairchild also reserves the right to use summary tables to describe his opinions.

Description	Type	Case #	Bates Begin- ning	Bates Ending
5:18-cv-00712 (Vidal)				
Fairchild LCP Report (Mar- garette Vidal)	Expert	18-712	006790	006828
Fairchild CV	Expert	18-712	006829	006834
Fairchild Fee Schedule	Expert	18-712	006835	006835
Fairchild Testimony List	Expert	18-712	006836	006851
5:18-cv-00949 (McNulty)				
Fairchild LCP Report (HM)	Expert	18-949	004364	004416
Fairchild LCP Report (JM)	Expert	18-949	004417	004463
Fairchild Report (Tara McNulty)	Expert	18-949	004464	004478
Fairchild CV	Expert	18-949	004479	004484
Fairchild Fee Schedule	Expert	18-949	004485	004485
Fairchild Testimony List	Expert	18-949	004486	004501
5:19-cv-00289 (Ward)				
Fairchild LCP Report (R.W.)	Expert	19-289	008294	008385
Fairchild CV	Expert	19-289	008386	008391
Fairchild Fee Schedule	Expert	19-289	008392	008392
Fairchild Invoice	Expert	19-289	008393	008394
Fairchild Testimony List	Expert	19-289	008395	008410
5:19-cv-00691 (Braden)				
Deborah Braden				

Description	Type	Case #	Bates Begin- ning	Bates Ending
Fairchild LCP Report (Deborah Braden)	Expert	DBRADEN- 19-691	002857	002906
Fairchild CV	Expert	DBRADEN- 19-691	002907	002912
Fairchild Testimony List	Expert	DBRADEN- 19-691	002913	002928
Fairchild Fee Schedule	Expert	DBRADEN- 19-691	002929	002929
Estate of Keith Braden				
Fairchild Earnings Report (Keith Braden)	Expert	KBRADEN- 19-691	000354	000371
Fairchild CV	Expert	KBRADEN- 19-691	000372	000377
Fairchild Testimony List	Expert	KBRADEN- 19-691	000378	000393
Fairchild Fee Schedule	Expert	KBRADEN- 19-691	000394	000394
Elizabeth Braden				
Fairchild Earnings Report (Keith Braden)	Expert	EBRADEN- 19-691	000563	000580
Fairchild CV	Expert	EBRADEN- 19-691	000581	000586
Fairchild Testimony List	Expert	EBRADEN- 19-691	000587	000602
Fairchild Fee Schedule	Expert	EBRADEN- 19-691	000603	000603
Benjamin Corrigan				

Description	Type	Case #	Bates Begin- ning	Bates Ending
Fairchild Report (B. Corri- gan)	Expert	BCORRI- GAN-19-691	000462	000480
Fairchild CV	Expert	BCORRI- GAN-19-691	000481	000486
Fairchild Fee Schedule	Expert	BCORRI- GAN-19-691	000487	000487
Fairchild Testimony List	Expert	BCORRI- GAN-19-691	000488	000503
Estate of Robert Corrigan				
Fairchild Earnings Report (R. Corrigan)	Expert	RCORRI- GAN-19-691	000787	000802
Fairchild CV	Expert	RCORRI- GAN-19-691	000803	000808
Fairchild Testimony List	Expert	RCORRI- GAN-19-691	000809	000824
Fairchild Fee Schedule	Expert	RCORRI- GAN-19-691	000825	000825
Estate of Shani Corrigan				
Fairchild Earnings Report (R. Corrigan)	Expert	SCORRI- GAN-19-691	000510	000525
Fairchild CV	Expert	SCORRI- GAN-19-691	000526	000531
Fairchild Testimony List	Expert	SCORRI- GAN-19-691	000532	000547
Fairchild Fee Schedule	Expert	SCORRI- GAN-19-691	000548	000548
Preston Corrigan				

Description	Type	Case #	Bates Begin- ning	Bates Ending
Fairchild Report (B. Corri- gan)	Expert	PCORRI- GAN-19-691	000645	000663
Fairchild CV	Expert	PCORRI- GAN-19-691	000664	000669
Fairchild Fee Schedule	Expert	PCORRI- GAN-19-691	000670	000670
Fairchild Testimony List	Expert	PCORRI- GAN-19-691	000671	000686
Estate of Robert Marshall				
Fairchild Earnings Report (R. Marshall)	Expert	RMAR- SHALL-19- 691	000392	000407
Fairchild CV	Expert	RMAR- SHALL-19- 691	000408	000413
Fairchild Testimony List	Expert	RMAR- SHALL-19- 691	000414	000429
Fairchild Fee Schedule	Expert	RMAR- SHALL-19- 691	000430	000430
Estate of Karen Marshall				
Fairchild Earnings Report (K. Marshall)	Expert	KMAR- SHALL-19- 691	000400	000415
Fairchild CV	Expert	KMAR- SHALL-19- 691	000416	000421

Description	Type	Case #	Bates Begin- ning	Bates Ending
Fairchild Testimony List	Expert	KMAR- SHALL-19- 691	000422	000437
Fairchild Fee Schedule	Expert	KMAR- SHALL-19- 691	000438	000438
Zachary Poston				
Fairchild Earnings Report (Z. Poston)	Expert	ZPOSTON- 19-691	003819	003839
Fairchild LCP Report (Z. Poston)	Expert	ZPOSTON- 19-691	003840	003918
Fairchild CV	Expert	ZPOSTON- 19-691	003919	003924
Fairchild Testimony List	Expert	ZPOSTON- 19-691	003925	003940
Fairchild Fee Schedule	Expert	ZPOSTON- 19-691	003941	003941
Estate of Peggy Warden				
Fairchild Earnings Report (P. Warden)	Expert	PWARDEN- 19-691	000357	000364
Fairchild CV	Expert	PWARDEN- 19-691	000365	000370
Fairchild Testimony List	Expert	PWARDEN- 19-691	000371	000386
Fairchild Fee Schedule	Expert	PWARDEN- 19-691	000387	000387
Elizabeth Braden obo Z.Z.				
Fairchild LCP Report (Z.Z.)	Expert	ZZAVALA-19- 691	010821	010918

Description	Type	Case #	Bates Begin- ning	Bates Ending
Fairchild Earnings Report (Z.Z.)	Expert	ZZAVALA-19- 691	010919	010933
Fairchild CV	Expert	ZZAVALA-19- 691	010934	010939
Fairchild Testimony List	Expert	ZZAVALA-19- 691	010940	010955
Fairchild Fee Schedule	Expert	ZZAVALA-19- 691	010956	010956
5:19-cv-00706 (Lookingbill)				
Fairchild LCP PV Report (Lookingbill)	Expert	19-706	001619	001641
Fairchild LCP PV Report (R.T.)	Expert	19-706	001642	001666
Fairchild CV	Expert	19-706	001667	001672
Fairchild Fee Schedule	Expert	19-706	001673	001673
Fairchild Testimony List	Expert	19-706	001674	001689
5:19-cv-00714 (Solis)				
Fairchild LCP Report (Joaquin Ramirez)	Expert	19-714	001108	001141
Fairchild LCP Report (Ro- sanne Solis)	Expert	19-714	001142	001187
Fairchild CV	Expert	19-714	001188	001193
Fairchild Fee Schedule	Expert	19-714	001194	001194
Fairchild Testimony List	Expert	19-714	001195	001210
5:19-cv-00715 (McKenzie)				

Description	Type	Case #	Bates Begin- ning	Bates Ending
Fairchild LCP Report (Margaret McKenzie)	Expert	19-715	000826	000863
Fairchild CV	Expert	19-715	000864	000869
Fairchild Fee Schedule	Expert	19-715	000870	000870
Fairchild Testimony List	Expert	19-715	000871	000886
5:19-cv-00806 (Macias)				
Fairchild LCP PV Report (Juan Macias)	Expert	19-806	014002	014071
Fairchild CV	Expert	19-806	014072	014077
Fairchild Fee Schedule	Expert	19-806	014078	014078
Fairchild Testimony List	Expert	19-806	014079	014094
5:19-cv-00972 (McMahan)				
Chancie McMahan				
Fairchild LCP Report (R. Ward)	Expert	McMAHAN 19-972	008124	008215
Fairchild CV	Expert	McMAHAN 19-972	008216	008221
Fairchild Fee Schedule	Expert	McMAHAN 19-972	008222	008222
Fairchild Invoice	Expert	McMAHAN 19-972	008223	008224
Fairchild Testimony List	Expert	McMAHAN 19-972	008225	008240
5:20-cv-00109-XR (Braden II)				
Brenda Moulton				

Description	Type	Case #	Bates Begin- ning	Bates Ending
Fairchild LCP Report (B. Moulton)	Expert	BMOULTON- 20-109	002936	002984
Fairchild CV	Expert	BMOULTON- 20-109	002985	002990
Fairchild Testimony List	Expert	BMOULTON- 20-109	002991	003006
Fairchild Fee Schedule	Expert	BMOULTON- 20-109	003007	003007

10. Sharmila Dissanaïke, MD FACS FCCM

Areas of Expertise: Medical care and costs

Dr. Sharmila Dissanaïke is a practicing Emergency Room and double-Board-Certified Trauma Surgeon, having been certified by the American Board of Surgery in both General Surgery and Surgical Critical Care. Dr. Dissanaïke is the Chair of the Department of Surgery at Texas Tech University Health Sciences Center and Chief of Surgery at University Medical Center. She holds current full and unrestricted medical licensure in Texas. Dr. Dissanaïke obtained her M.B.B.S (MD) from University of Sydney, Australia, graduating Summa cum Laude, and completed her bachelor's and advanced level training in Biological Sciences at Methodist College in Colombo Sri Lanka, graduating as Valedictorian. For a more detailed summary of Dr. Dissanaïke's skills, training, education, experience, and knowledge, please see his curriculum vitae, which is attached as noted in the chart below and is incorporated by reference into this designation.

Dr. Dissanaïke will testify as to the reasonableness and necessity of the past medical care and costs for the Plaintiffs in the cases identified below, and related issues in this case. She will testify to any subject on which he has factual knowledge or is within her area of expertise. She will testify regarding any opinion or fact or issue raised by the Defendant, its employees, any of Defendant's witnesses, or any Defense expert within her area of expertise.

Dr. Dissanaïke's opinions are based on reviews of medical and billing records, medical illustrations of injuries, testimony taken and to be taken in this case, any specific literature she may have relied upon, and her education, training, and experience.

At this time, Plaintiffs have no further knowledge of the mental impressions, opinions and facts known to this expert other than those contained in her reports. For a more detailed discussion of his opinions and bases for those opinions, please see her reports, which are attached as noted in the chart below and are incorporated by reference into this designation. Dr. Dissanaïke is available for deposition and Defendant may examine her for a more detailed explanation of her opinions and basis for those opinions relating to this case. Once she has given deposition or other testimony in this case, Plaintiffs incorporate such testimony by reference into this designation.

A list of the cases Dr. Dissanaïke has testified in either by deposition or trial, as well as her fee schedule, are attached as noted in the chart below and are incorporated by reference into this designation.

Dr. Dissanaïke reserves the right to use any exhibits previously produced by Plaintiffs, any part or part of her expert report or cited literature, any exhibits that have or will be exchanged in discovery, and any documents that she brings with her

to her deposition. Dr. Dissanaïke also reserves the right to use summary tables to describe her opinions.

Description	Type	Case #	Bates Begin- ning	Bates Ending
5:18-cv-00712 (Vidal)				
Dissanaïke Report (Mar- garette Vidal)	Expert	18-712	006745	006746
Dissanaïke CV	Expert	18-712	006747	006787
Dissanaïke Fee Schedule	Expert	18-712	006788	006788
Dissanaïke Testimony List	Expert	18-712	006789	006789
5:18-cv-00949 (McNulty)				
Dissanaïke Report (HM)	Expert	18-949	004317	004318
Dissanaïke Report (JM)	Expert	18-949	004319	004320
Dissanaïke CV	Expert	18-949	004321	004361
Dissanaïke Fee Schedule	Expert	18-949	004362	004362
Dissanaïke Testimony List	Expert	18-949	004363	004363
5:19-cv-00184 (Brown)				
Cover Ltr for Dr. Dissanaïke	Expert	19-184	001638	001638
Dr. Dissanaïke – CV	Expert	19-184	001639	001679
Dr. Dissanaïke – Testimony List	Expert	19-184	001680	001680
Dr. Dissanaïke Rpt [F. Brown]	Expert	19-184	001690	001691
Dissanaïke - Legal Fees Schedule	Expert	19-184	001696	001696
5:19-cv-00691 (Braden)				

Description	Type	Case #	Bates Begin- ning	Bates Ending
Deborah Braden				
Dissanaike Report (Deborah Braden)	Expert	DBRADEN-19-691	002812	002813
Dissanaike CV	Expert	DBRADEN-19-691	002814	002854
Dissanaike Testimony List	Expert	DBRADEN-19-691	002855	002855
Dissanaike Fee Schedule	Expert	DBRADEN-19-691	002856	002856
Zachary Poston				
Dissanaike Report (Z. Poston)	Expert	ZPOSTON-19-691	003773	003775
Dissanaike CV	Expert	ZPOSTON-19-691	003776	003816
Dissanaike Testimony List	Expert	ZPOSTON-19-691	003817	003817
Dissanaike Fee Schedule	Expert	ZPOSTON-19-691	003818	003818
Elizabeth Braden obo Z.Z.				
Dissanaike Report (Z.Z.)	Expert	ZZAVALA-19-691	010775	010777
Dissanaike CV	Expert	ZZAVALA-19-691	010778	010818
Dissanaike Testimony List	Expert	ZZAVALA-19-691	010819	010819
Dissanaike Fee Schedule	Expert	ZZAVALA-19-691	010820	010820
5:19-cv-00714 (Solis)				

Description	Type	Case #	Bates Begin- ning	Bates Ending
Dissanaike Report (Joaquin Ramirez)	Expert	19-714	001062	001062
Dissanaike Report (Rosanne Solis)	Expert	19-714	001063	001064
Dissanaike CV	Expert	19-714	001065	001105
Dissanaike Fee Schedule	Expert	19-714	001106	001106
Dissanaike Testimony List	Expert	19-714	001107	001107
5:19-cv-00715 (McKenzie)				
Dissanaike Report (Margaret McKenzie)	Expert	19-715	000782	000782
Dissanaike CV	Expert	19-715	000783	000823
Dissanaike Fee Schedule	Expert	19-715	000824	000824
Dissanaike Testimony List	Expert	19-715	000825	000825
5:20-cv-00109-XR (Braden II)				
Robert Braden				
Dissanaike Rpt (R. Braden)	Expert	RBRADEN- 20-109	000273	000273
Dissanaike CV	Expert	RBRADEN- 20-109	000274	000314
Dissanaike Testimony List	Expert	RBRADEN- 20-109	000315	000315
Dissanaike Fee Schedule	Expert	RBRADEN- 20-109	000316	000316
Brenda Moulton				
Dissanaike Report (B. Moulton)	Expert	BMOULTON -20-109	002891	002892

Description	Type	Case #	Bates Begin- ning	Bates Ending
Dissanaike CV	Expert	BMOULTON -20-109	002893	002933
Dissanaike Testimony List	Expert	BMOULTON -20-109	002934	002934
Dissanaike Fee Schedule	Expert	BMOULTON -20-109	002935	002935

11. Katy Fowler Sutton, PsyD, LSSP

Area of Expertise: Clinical psychology

Dr. Katy Sutton has a PsyD in clinical psychology and is an active, licensed clinical psychologist in the State of Texas. Dr. Sutton is also a licensed specialist in school psychology in Texas. Dr. Sutton earned her B.A. in Psychology from the University of Texas at Arlington, and her M.S. and PsyD in Clinical Psychology from Baylor University. For a more detailed summary of Dr. Sutton's skills, training, education, experience, and knowledge, please see her curriculum vitae that is attached as noted in the chart below and is incorporated by reference into this designation.

Dr. Sutton will testify as to any psychological issues in this case for the Plaintiffs in the cases identified below. She will testify to any subject on which she has factual knowledge or is within her area of expertise. She will testify regarding any opinion or fact or issue raised by the Defendant, its employees, any of Defendant's witnesses, or any Defense expert within her area of expertise.

Dr. Sutton's opinions are based on interviews, testing and evaluations of the Plaintiffs as identified in the reports referenced in the chart below, which also

reference the records she reviewed, such as Plaintiffs' health care records, depositions, academic records, testimony taken and to be taken in this case, any specific literature she may have relied upon, and her education, training, and experience.

At this time, Plaintiffs have no further knowledge of the mental impressions, opinions and facts known to this expert other than those contained in her reports. For a more detailed discussion of Dr. Sutton's opinions and bases for those opinions, please see her reports, which are attached as noted in the chart below and are incorporated by reference into this designation. Dr. Sutton is available for deposition and Defendant may examine her for a more detailed explanation of her opinions and basis for those opinions relating to this case. Once she has given deposition or other testimony in this case, Plaintiffs incorporate such testimony by reference into this designation.

A list of the cases Dr. Sutton has testified in either by deposition or trial, as well as her fee schedule, are attached as noted in the chart below and are incorporated by reference into this designation.

Dr. Sutton reserves the right to use any exhibits previously produced by Plaintiffs, any part or part of her expert report or cited literature, any exhibits that have or will be exchanged in discovery, and any documents that she brings with her to her deposition. Dr. Sutton also reserves the right to use summaries to describe her opinions.

Description	Type	Case #	Bates Beginning	Bates Ending
5:18-cv-00555 (Holcombe)				
Sutton Report (Claryce Holcombe)	Expert	18-555	000168	000179

Description	Type	Case #	Bates Begin- ning	Bates Ending
Sutton Report (Joe Hol- combe)	Expert	18-555	000180	000192
Sutton CV	Expert	18-555	000193	000197
Sutton Fee Schedule	Expert	18-555	000198	000198
Sutton Testimony List	Expert	18-555	000199	000202
PTSD Illustration	Expert	18-555	000221	000221
5:18-cv-00944 (Ramsey)				
Sutton Report (Gary Ramsey)	Expert	18-944	000067	000077
Sutton Report (Ronald Ram- sey, Jr.)	Expert	18-944	000078	000088
Sutton CV	Expert	18-944	000089	000093
Sutton Testimony List	Expert	18-944	000094	000097
Sutton Fee Schedule	Expert	18-944	000098	000098
PTSD Illustration	Expert	18-944	000116	000116
5:19-cv-00805 (Curnow)				
Sutton Report (Fred Curnow)	Expert	19-805	000041	000051
Sutton Report (Kathleen Cur- now)	Expert	19-805	000052	000063
Sutton CV	Expert	19-805	000064	000068
Sutton Fee Schedule	Expert	19-805	000069	000069
Sutton Testimony List	Expert	19-805	000070	000073
PTSD Illustration	Expert	19-805	000074	00074
5:19-cv-00806 (Macias)				
PTSD Illustration	Expert	19-806	014255	014255

Description	Type	Case #	Bates Begin- ning	Bates Ending
Sutton Report (Jennifer Macias)	Expert	19-806	014259	014268
Sutton CV	Expert	19-806	014269	014273
Sutton Fee Schedule	Expert	19-806	014274	014274
Sutton Testimony List	Expert	19-806	014275	014278
Sutton Report (Juan Macias)	Expert	19-806	014279	014289
5:19-cv-01318 (Holcombe II)				
PTSD Illustration	Expert	19-1318	000185	000185
Sutton CV	Expert	19-1318	000220	000224
Sutton Fee Schedule	Expert	19-1318	000225	000225
Sutton Testimony List	Expert	19-1318	000226	000229
Sutton Report (John Porter Holcombe)	Expert	19-1318	000230	000241
5:20-cv-00368 (John Porter Holcombe ANF/Ind Admin Hill Children)				
PTSD Illustration	Expert	20-368	000504	000504
Sutton CV	Expert	20-368	000508	000512
Sutton Fee Schedule	Expert	20-368	000513	000513
Sutton Testimony List	Expert	20-368	000514	000517
Sutton Report (PJH)	Expert	20-368	000847	000857
Sutton Report (EJH)	Expert	20-368	000858	000867

12. Mary Kennington, Ph.D.

Area of Expertise: Clinical psychology

Dr. Mary Kennington is a licensed psychologist providing trauma and grief therapy to Farida Brown. Dr. Kennington earned her Ph.D. in Clinical Psychology from Brigham Young University. She interned at Baylor College of Medicine. Her doctoral fellowship was completed through the University of Texas Medical School, Houston. She has been licensed in the State of Texas since 1995. For a more detailed summary of Dr. Kennington's skills, training, education, experience, and knowledge, please see her curriculum vitae that is attached as noted in the chart below and is incorporated by reference into this designation.

Dr. Kennington will testify as to any psychological issues in this case for Plaintiff Farida Brown in the case identified below. She will testify to any subject on which she has factual knowledge or is within her area of expertise. She will testify regarding any opinion or fact or issue raised by the Defendant, its employees, any of Defendant's witnesses, or any Defense expert within her area of expertise.

Dr. Kennington's opinions are based on interviews, testing and evaluations of Plaintiff Farida Brown as identified in the report and records referenced in the chart below, which also reference the records she reviewed, such as Plaintiffs' health care records, testimony taken and to be taken in this case, any specific literature she may have relied upon, and her education, training, and experience.

At this time, Plaintiffs have no further knowledge of the mental impressions, opinions and facts known to this expert other than those contained in her report. For a more detailed discussion of Dr. Kennington's opinions and bases for those opinions, please see her report, which is attached as noted in the chart below and is incorporated by reference into this designation. Dr. Kennington is available for deposition and Defendant may examine her for a more detailed explanation of her opinions and basis for those opinions relating to this case. Once she has given deposition

or other testimony in this case, Plaintiffs incorporate such testimony by reference into this designation.

Dr. Kennington has not testified either by deposition or trial, so no testimony list is provided. Her billing is attached as noted in the chart below and incorporated by reference into this designation.

Dr. Kennington reserves the right to use any exhibits previously produced by Plaintiffs, any part or part of her expert report or cited literature, any exhibits that have or will be exchanged in discovery, and any documents that she brings with her to her deposition. Dr. Kennington also reserves the right to use summaries to describe her opinions.

Description	Type	Case #	Bates Beginning	Bates Ending
5:19-cv-00184 (Brown)				
Kennington Records [F. Brown]	Medical	19-184	001606	001636
Dr. Kennington – CV	Expert	19-184	001688	001689
Dr. Kennington Report [F. Brown]	Expert	19-184	001692	001695
Dr. Kennington Billing [F. Brown as of 3.12.20]	Expert	19-184	001829	001831

13. Jacqueline Valencia Mendez, M.R.C., L.P.C., C.R.C., C.L.C.P.

Areas of Expertise: Vocational Economic Analysis

Jacqueline Valencia Mendez is a Licensed Professional Counselor, Certified Rehabilitation Counselor, and Certified Life Care Planner. Ms. Mendez earned her

Bachelor of Science in Psychology from University of Houston, her Master in Rehabilitation Counseling from Texas Tech University, her Life Care Planning Certification from University of Florida/MediPro and completed her Licensed Professional Counselor training at University of Houston Clear Lake. For a more detailed summary of Ms. Mendez's skills, training, education, experience, and knowledge, please see his curriculum vitae, which is attached as noted in the chart below and is incorporated by reference into this designation.

Ms. Mendez will testify as to any vocational economic assessments, vocational rehabilitation, analysis of wage-earning capacity, and related issues for Plaintiff Minor R.W. in the cases identified below. She will testify to any subject on which she has factual knowledge or is within her area of expertise. She will testify regarding any opinion or fact or issue raised by the Defendant, its employees, any of Defendant's witnesses, or any Defense expert within his area of expertise.

Her opinions are based on interviews with Plaintiffs Minor R.W. and Chancie McMahan, a review of documents related to her areas of expertise, such as medical records, academic records, and other expert reports, which are identified in the report referenced in the chart below, testimony taken and to be taken in this case, any specific literature she may have relied upon, and her education, training, and experience.

At this time, Plaintiffs have no further knowledge of the mental impressions, opinions and facts known to this expert other than those contained in her report. For a more detailed discussion of his opinions and bases for those opinions, please see his reports, which are attached as noted in the chart below and are incorporated by reference into this designation. Ms. Mendez is available for deposition and Defendant may examine him for a more detailed explanation of her opinions and basis

for those opinions relating to this case. Once she has given deposition or other testimony in this case, Plaintiffs incorporate such testimony by reference into this designation.

A list of the cases Ms. Mendez has testified in either by deposition or trial, as well as her fee schedule, are attached as noted in the chart below and are incorporated by reference into this designation.

Ms. Mendez reserves the right to use any exhibits previously produced by Plaintiffs, any part or part of her expert report or cited literature, any exhibits that have or will be exchanged in discovery, and any documents that she brings with her to her deposition. Ms. Mendez also reserves the right to use summary tables to describe her opinions.

Description	Type	Case #	Bates Beginning	Bates Ending
5:19-cv-00289 (Ward)				
Mendez Report (R. Ward)	Expert	19-289	008436	008445
Mendez CV	Expert	19-289	008446	008447
Mendez Fee Schedule	Expert	19-289	008448	008448
Mendez Testimony List	Expert	19-289	008449	008453
5:19-cv-00972 (McMahan)				
Chancie McMahan				
Mendez Report (R. Ward)	Expert	McMAHAN 19-972	008266	008275
Mendez CV	Expert	McMAHAN 19-972	008276	008277

Description	Type	Case #	Bates Beginning	Bates Ending
Mendez Fee Schedule	Expert	McMAHAN 19-972	008278	008278
Mendez Testimony List	Expert	McMAHAN 19-972	008279	008283

14. Angel Roman, M.D.

Areas of Expertise: Life Care Planning, Physical Medicine and Rehabilitation

Dr. Angel Roman is a Board-Certified Physical Medicine & Rehabilitation Specialist, and a Board Certified Electrodiagnostic Medicine Specialist. He is a Certified Life Care Planner and a Certified Physician Life Care Planner. Dr. Roman earned a B.S. in Biology from Trinity University in San Antonio and an M.D. from the University of Texas Health Science Center at San Antonio. For a more detailed summary of Dr. Roman's skills, training, education, experience, and knowledge, please see his curriculum vitae, which is attached as noted in the chart below and is incorporated by reference into this designation.

Dr. Roman will testify as to any rehabilitation and life care planning issues in this case for Plaintiff Minor R.W. in the cases identified below. He will testify to any subject on which he has factual knowledge or is within his area of expertise. He will testify regarding any opinion or fact or issue raised by the Defendant, its employees, any of Defendant's witnesses, or any Defense expert within his area of expertise.

His opinions are based on an interview, evaluation, and physical examination of Plaintiff Minor R.W. as identified in the reports referenced in the chart below,

and a review of the Plaintiff's health care records, testimony taken and to be taken in this case, any specific literature he may have relied upon, and his education, training, and experience.

At this time, Plaintiffs have no further knowledge of the mental impressions, opinions and facts known to this expert other than those contained in his reports. For a more detailed discussion of his opinions and bases for those opinions, please see his reports, which are attached as noted in the chart below and are incorporated by reference into this designation. Dr. Roman is available for deposition and Defendant may examine him for a more detailed explanation of his opinions and basis for those opinions relating to this case. Once he has given deposition or other testimony in this case, Plaintiffs incorporate such testimony by reference into this designation.

A list of the cases Dr. Roman has testified in either by deposition or trial, as well as his fee schedule, are attached as noted in the chart below and are incorporated by reference into this designation.

Dr. Roman reserves the right to use any exhibits previously produced by Plaintiffs, any part or part of his expert report or cited literature, any exhibits that have or will be exchanged in discovery, and any documents that he brings with him to his deposition. Dr. Roman also reserves the right to use summary tables to describe his opinions. Dr. Roman may also use the photos and videos taken by him or his staff which are produced as part of the reports referenced below.

Description	Type	Case #	Bates Beginning	Bates Ending
5:19-cv-00289 (Ward)				

Description	Type	Case #	Bates Beginning	Bates Ending
Roman Life Care Plan (R. Ward)	Expert	19-289	008454	008560
PLCP Examination Information Form (R. Ward)	Expert	19-289	008561	008577
Roman CV	Expert	19-289	008578	008583
Roman Fee Agreement	Expert	19-289	008584	008593
Roman Testimony List	Expert	19-289	008594	008610
List of R. Ward Medical Procedures	Expert	19-289	008611	008611
5:19-cv-00972 (McMahan)				
Chancie McMahan				
Roman Life Care Plan (R. Ward)	Expert	McMAHAN 19-972	008287	008393
PLCP Examination Information Form (R. Ward)	Expert	McMAHAN 19-972	008394	008410
Roman CV	Expert	McMAHAN 19-972	008411	008416
Roman Testimony List	Expert	McMAHAN 19-972	008417	008433
Roman Fee Agreement	Expert	McMAHAN 19-972	008434	008443

15. Kasi Bowles Howard, Psy.D.

Area of Expertise: Clinical psychology

Dr. Kasi Bowles Howard is a clinical psychologist in private practice and has worked with individuals with histories of trauma for over a decade. She earned her Masters and Psy.D. in Clinical Psychology at Regent University in Virginia Beach, Virginia, and her B.A. in Psychology from Baylor University in Waco, Texas. For a more detailed summary of Dr. Howard's skills, training, education, experience, and knowledge, please see her curriculum vitae that is attached as noted in the chart below and is incorporated by reference into this designation.

Dr. Howard will testify as to any psychological issues in this case for the Plaintiffs in the cases identified below. She will testify to any subject on which she has factual knowledge or is within her area of expertise. She will testify regarding any opinion or fact or issue raised by the Defendant, its employees, any of Defendant's witnesses, or any Defense expert within her area of expertise.

Dr. Howard's opinions are based on interviews, testing and evaluations of the Plaintiffs as identified in the reports referenced in the chart below, which also reference the records she reviewed, such as Plaintiffs' health care records, depositions, academic records, testimony taken and to be taken in this case, any specific literature she may have relied upon, and her education, training, and experience.

At this time, Plaintiffs have no further knowledge of the mental impressions, opinions and facts known to this expert other than those contained in her reports. For a more detailed discussion of Dr. Howard's opinions and bases for those opinions, please see her reports, which are attached as noted in the chart below and are incorporated by reference into this designation. Dr. Howard is available for deposition and Defendant may examine her for a more detailed explanation of her opinions and basis for those opinions relating to this case. Once she has given deposition

or other testimony in this case, Plaintiffs incorporate such testimony by reference into this designation.

A list of the cases Dr. Howard has testified in either by deposition or trial, as well as her fee schedule, are attached as noted in the chart below and are incorporated by reference into this designation.

Dr. Howard reserves the right to use any exhibits previously produced by Plaintiffs, any part or part of her expert report or cited literature, any exhibits that have or will be exchanged in discovery, and any documents that she brings with her to her deposition. Dr. Howard also reserves the right to use summaries to describe her opinions.

Description	Type	Case #	Bates Beginning	Bates Ending
5:18-cv-00949 (McNulty) / Intervenor Ruben Rios [5:18-cv-00949]				
Howard Report (R. Rios)	Expert	RIOS-18-949	000328	000335
Howard CV & Testimony List	Expert	RIOS-18-949	000336	000343
Howard Fee Schedule	Expert	RIOS-18-949	000344	000345

16. Irmo Marini, Ph.D., D.Sc., CLCP, CRC

Areas of Expertise: Vocational Economic Analysis

Dr. Irmo Marini is a Certified Life Care Planner, Certified Rehabilitation Counselor, and a Social Security Vocational Expert. Dr. Marini earned his Bachelor of Arts in Psychology and Master of Arts in Clinical Psychology from Lakehead University in Thunder Bay, Canada, and his Doctor of Philosophy, majoring in Rehabilitation, from Auburn University. For a more detailed summary of Dr. Marini's skills, training, education, experience, and knowledge, please see his curriculum vitae, which is attached as noted in the chart below and is incorporated by reference into this designation.

Dr. Marini will testify as to any vocational economic assessments, vocational rehabilitation, and related issues for Plaintiff Morgan Harris in the case identified below. He will testify to any subject on which he has factual knowledge or is within his area of expertise. He will testify regarding any opinion or fact or issue raised by the Defendant, its employees, any of Defendant's witnesses, or any Defense expert within his area of expertise.

His opinions are based on an interview with Plaintiff Morgan Harris and review of documents related to his areas of expertise, such as medical records, which are identified in his report referenced in the chart below, testimony taken and to be taken in this case, any specific literature he may have relied upon, and his education, training, and experience.

At this time, Plaintiffs have no further knowledge of the mental impressions, opinions and facts known to this expert other than those contained in his report. For a more detailed discussion of his opinions and bases for those opinions, please see his reports, which are attached as noted in the chart below and are incorporated by reference into this designation. Dr. Marini is available for deposition and Defendant may examine him for a more detailed explanation of his opinions and basis

for those opinions relating to this case. Once he has given deposition or other testimony in this case, Plaintiffs incorporate such testimony by reference into this designation.

A list of the cases Dr. Marini has testified in either by deposition or trial, as well as his fee schedule, are attached as noted in the chart below and are incorporated by reference into this designation.

Dr. Marini reserves the right to use any exhibits previously produced by Plaintiffs, any part or part of his expert report or cited literature, any exhibits that have or will be exchanged in discovery, and any documents that he brings with him to his deposition. Dr. Marini also reserves the right to use summary tables to describe his opinions.

Description	Type	Case #	Bates Beginning	Bates Ending
5:19-cv-00506 (Kris Workman)				
Marini Report (Kris Workman)	Expert	19-506	003510	003516
Marini CV	Expert	19-506	003517	003549
Marini Fee Schedules	Expert	19-506	003550	003553
Marini Testimony List	Expert	19-506	003554	003564
5:19-cv-00678 (David Colbath)				
Marini Report (D. Colbath)	Expert	19-678	003995	004004
Marini CV	Expert	19-678	004005	004037
Marini Fee Schedules	Expert	19-678	004038	004041

Description	Type	Case #	Bates Beginning	Bates Ending
Marini Testimony List	Expert	19-678	004042	004052
5:19-cv-00705 (Kyle Workman & Morgan Harris)				
Morgan Harris				
Marini Report [M. Harris]	Expert	MHARRIS-19-705	000724	000730
Marini Fee Schedules	Expert	MHARRIS-19-705	000731	000734
Marini Retainer Agreement	Expert	MHARRIS-19-705	000770	000770
Marini CV	Expert	MHARRIS-19-705	000771	000803
Marini Testimony List	Expert	MHARRIS-19-705	000804	000814

17. Christopher B. Ticknor, MD

Area of Expertise: Psychiatry

Dr. Christopher B. Ticknor is in private practice as a psychiatrist. He is a Diplomate in Psychiatry, having been certified by the American Board of Psychiatry. Dr. Ticknor received his M.D. from The University of Texas Health Science Center, San Antonio and his B.S. in Biology from Southern Methodist University in Dallas, Texas. He serves as the Chief of the Division of Forensic Psychiatry at University of the Incarnate Word School of Medicine in San Antonio, Texas and Adjunct Professor of Psychiatry at UT Health San Antonio. Dr. Ticknor also serves as the team psychiatrist for the San Antonio Spurs. For a more detailed summary of Dr.

Ticknor's skills, training, education, experience, and knowledge, please see his curriculum vitae that is attached as noted in the chart below and is incorporated by reference into this designation.

Dr. Ticknor will testify as to any psychological issues in this case for the Plaintiffs in the cases identified below. He will testify to any subject on which he has factual knowledge or is within his area of expertise. He will testify regarding any opinion or fact or issue raised by the Defendant, its employees, any of Defendant's witnesses, or any Defense expert within his area of expertise.

His opinions are based on an interview and evaluation of the Plaintiffs as identified in the reports referenced in the chart below, which also reference the records he reviewed, such as Plaintiffs' medical records, Diagnostic Manual of Mental Disorders, Fifth Edition,(DSM-5), published by the American Psychiatric Association, May 2013, testimony taken and to be taken in this case, any specific literature he may have relied upon, and his education, training, and experience.

At this time, Plaintiffs have no further knowledge of the mental impressions, opinions and facts known to this expert other than those contained in his reports. For a more detailed discussion of his opinions and bases for those opinions, please see his reports, which are attached as noted in the chart below and are incorporated by reference into this designation. Dr. Ticknor is available for deposition and Defendant may examine him for a more detailed explanation of his opinions and basis for those opinions relating to this case. Once he has given deposition or other testimony in this case, Plaintiffs incorporate such testimony by reference into this designation.

A list of the cases Dr. Ticknor has testified in either by deposition or trial is attached as noted in the chart below and is incorporated by reference into this

designation. Dr. Ticknor charges \$575.00 per hour for forensic consulting, writing reports and testifying in cases.

Dr. Ticknor reserves the right to use any exhibits previously produced by Plaintiffs, any part or part of his expert report or cited literature, any exhibits that have or will be exchanged in discovery, and any documents that he brings with him to his deposition. Dr. Ticknor also reserves the right to use summary tables to describe his opinions.

Description	Type	Case #	Bates Beginning	Bates Ending
5:19-cv-00506 (Kris Workman)				
Ticknor Expert Report for Kris Workman [6.10.18]	Expert	19-506	002827	002835
Ticknor Expert Report for Kris Workman [12.19.19]	Expert	19-506	003462	003471
Ticknor CV	Expert	19-506	003472	003486
Ticknor Testimony List	Expert	19-506	003487	003494
5:19-cv-00678 (David Colbath)				
Dr. Christopher Ticknor M.D.'s Expert Report for David Colbath	Expert	19-678	002482	002488
Ticknor CV	Expert	19-678	003673	003687
Ticknor Testimony List	Expert	19-678	003688	003695
Ticknor Report [D. Colbath 12.19.19]	Expert	19-678	003967	003975
5:19-cv-00705 (Kyle Workman & Morgan Harris)				
Kyle Workman				

Description	Type	Case #	Bates Beginning	Bates Ending
Ticknor Report [Kyle Workman 7.24.18]	Expert	KWORK-MAN-19-705	000001	000007
Ticknor Report [Kyle Workman 12.19.19]	Expert	KWORK-MAN-19-705	000008	000015
Ticknor CV	Expert	KWORK-MAN-19-705	000016	000030
Ticknor Testimony List	Expert	KWORK-MAN-19-705	000031	000038
Morgan Harris				
Ticknor Report [M. Harris 12.19.19]	Expert	MHARRIS-19-705	000720	000723
Ticknor CV	Expert	MHARRIS-19-705	000815	000829
Ticknor Testimony List	Expert	MHARRIS-19-705	000830	000837
5:19-cv-00953 (Kip Workman & Julie Workman)				
Kip Workman				
Ticknor Report (Kip Workman 7.24.18)	Expert	KWorkman-19-953	000002	000008
Ticknor CV	Expert	KWorkman-19-953	000009	000023
Ticknor Testimony List	Expert	KWorkman-19-953	000024	000031
Ticknor Report (Kip Workman 12.19.19)	Expert	KWorkman-19-953	000032	000039
Julie Workman				

Description	Type	Case #	Bates Beginning	Bates Ending
Ticknor Report (Julie Workman 7.23.18)	Expert	JWorkman-19-953	000002	000009
Ticknor Report (Julie Workman 12.19.19)	Expert	JWorkman-19-953	000010	000019
Ticknor CV	Expert	JWorkman-19-953	000020	000034
Ticknor Testimony List	Expert	JWorkman-19-953	000035	000042
5:19-cv-01481 (Colbey Workman)				
Ticknor Report (Colbey Workman)	Expert	19-1481	000001	000005
Ticknor CV	Expert	19-1481	000006	000020
Ticknor Testimony List	Expert	19-1481	000021	000028

18. Joann Murphey, Ph.D., ABPP, FICPP

Area of Expertise: Clinical psychology

Dr. Joann Murphey is a clinical and forensic psychologist in private practice. She is a diplomate in clinical psychology as determined by the Academy of Clinical Psychology and a diplomate fellow in psychopharmacology as determined by the International College of Prescribing Psychologists. Dr. Murphey earned her B.S. in Elementary Education, as well as Ph.D.'s in both Clinical and School Psychology, from University of Tennessee in Knoxville. For a more detailed summary of Dr. Murphey's skills, training, education, experience, and knowledge, please see her curriculum vitae that is attached as noted in the chart below and is incorporated by reference into this designation.

Dr. Murphey will testify as to any psychological issues in this case for the Plaintiffs in the cases identified below. She will testify to any subject on which she has factual knowledge or is within her area of expertise. She will testify regarding any opinion or fact or issue raised by the Defendant, its employees, any of Defendant's witnesses, or any Defense expert within her area of expertise.

Dr. Murphey's opinions are based on interviews, testing and evaluations of the Plaintiffs as identified in the reports referenced in the chart below, which also reference the records she reviewed, such as Plaintiffs' health care records, depositions, academic records, testimony taken and to be taken in this case, any specific literature she may have relied upon, and her education, training, and experience.

At this time, Plaintiffs have no further knowledge of the mental impressions, opinions and facts known to this expert other than those contained in her reports. For a more detailed discussion of Dr. Murphey's opinions and bases for those opinions, please see her reports, which are attached as noted in the chart below and are incorporated by reference into this designation. Dr. Murphey is available for deposition and Defendant may examine her for a more detailed explanation of her opinions and basis for those opinions relating to this case. Once she has given deposition or other testimony in this case, Plaintiffs incorporate such testimony by reference into this designation.

Dr. Murphey has not provided testimony in the last four years, and she charges \$250.00 per hour.

Dr. Murphey reserves the right to use any exhibits previously produced by Plaintiffs, any part or part of her expert report or cited literature, any exhibits that have or will be exchanged in discovery, and any documents that she brings with her

to her deposition. Dr. Murphey also reserves the right to use summaries to describe her opinions.

Description	Type	Case #	Bates Beginning	Bates Ending
5:19-cv-01300 (David Colbath ANF O.C.)				
Murphey Report (O.C.)	Expert	19-1300	000001	000013
Murphey CV	Expert	19-1300	000014	000021
Murphey Testimony List	Expert	19-1300	000022	000026
5:19-cv-01301 (Kris & Colbey Workman ANF E.W.)				
Murphey Report (E.W.)	Expert	19-1301	000001	000009
Murphey CV	Expert	19-1301	000010	000017
Murphey Testimony List	Expert	19-1301	000018	000022

19. Dan M. Bagwell, R.N.

Areas of Expertise: Life Care Planning, Physical Medicine and Rehabilitation

Dan M. Bagwell is a Registered Nurse and Certified Life Care Planner, Certified Disability Management Specialist, and Certified Case Manager. He currently serves as Chief Executive Officer of Rehabilitation Professional Consultants, Inc. in San Antonio, Texas. Mr. Bagwell earned his Bachelor of Science in Nursing (With Honors) from the University of Mississippi School of Nursing and also completed graduate studies at University of Texas at San Antonio, School of Business and post-graduate work in Life Care Planning for Advanced Catastrophic Case Management at the University of Florida Department of Rehabilitation Counseling and The Rehabilitation Training Institute. For a more detailed summary of Mr. Bagwell's

skills, training, education, experience, and knowledge, please see his curriculum vitae, which is attached as noted in the chart below and is incorporated by reference into this designation.

Mr. Bagwell will testify as to the costs and related matters in the Life Care Plans he developed in conjunction with any Dr. David J. Altman regarding rehabilitation and life care planning issues for the Plaintiffs in the cases identified below. He will testify to any subject on which he has factual knowledge or is within his area of expertise. He will testify regarding any opinion or fact or issue raised by the Defendant, its employees, any of Defendant's witnesses, or any Defense expert within his area of expertise.

His opinions are based on an interview, evaluation, and physical examination of the Plaintiffs as identified in the reports referenced in the chart below, and a review of the Plaintiffs' health care records, testimony taken and to be taken in this case, any specific literature he may have relied upon, and his education, training, and experience.

At this time, Plaintiffs have no further knowledge of the mental impressions, opinions and facts known to this expert other than those contained in his reports. For a more detailed discussion of his opinions and bases for those opinions, please see his reports, which are attached as noted in the chart below and are incorporated by reference into this designation. Mr. Bagwell is available for deposition and Defendant may examine him for a more detailed explanation of his opinions and basis for those opinions relating to this case. Once he has given deposition or other testimony in this case, Plaintiffs incorporate such testimony by reference into this designation.

A list of the cases Mr. Bagwell has testified in either by deposition or trial, as well as his fee schedule, are attached as noted in the chart below and are incorporated by reference into this designation.

Mr. Bagwell reserves the right to use any exhibits previously produced by Plaintiffs, any part or part of his expert report or cited literature, any exhibits that have or will be exchanged in discovery, and any documents that he brings with him to his deposition. Mr. Bagwell also reserves the right to use summary tables to describe his opinions.

Description	Type	Case #	Bates Beginning	Bates Ending
5:19-cv-00506 (Kris Workman)				
Bagwell-Altman Life Care Plan for Kris Workman	Expert	19-506	002836	002903
Life Care Cost Analysis for Kris Workman	Expert	19-506	002904	002911
Bagwell CV	Expert	19-506	003412	003417
Bagwell Testimony List	Expert	19-506	003444	003457
Bagwell-Altman Fee Agreement	Expert	19-506	003458	003461
5:19-cv-00678 (David Colbath)				
Life Care Cost Analysis for David Colbath	Expert	19-678	002489	002492
Life Care Plan for David Colbath	Expert	19-678	002493	002528
Bagwell CV	Expert	19-678	003917	003922
Bagwell Testimony List	Expert	19-678	003949	003962

Description	Type	Case #	Bates Beginning	Bates Ending
Altman-Bagwell Fee Agreement	Expert	19-678	003963	003966
Altman-Bagwell Life Care Plan Spreadsheet	Expert	19-678	004065	004068

20. David J. Altman, M.D., C.L.C.P.

Areas of Expertise: Life Care Planning, Physical Medicine and Rehabilitation

Dr. David J. Altman is a Board-Certified Neurologist and Certified Life Care Planner with extensive experience in clinical care, neurorehabilitation, life care planning, and clinical research. Dr. Altman earned his medical degree from University of CT School of Medicine in Farmington, Connecticut, and his Bachelor of Arts degree in Psychology from Brandeis University in Waltham, Massachusetts. For a more detailed summary of Dr. Altman's skills, training, education, experience, and knowledge, please see his curriculum vitae, which is attached as noted in the chart below and is incorporated by reference into this designation.

Dr. Altman will testify as to any rehabilitation and life care planning issues in this case for the Plaintiffs in the cases identified below. He will testify to any subject on which he has factual knowledge or is within his area of expertise. He will testify regarding any opinion or fact or issue raised by the Defendant, its employees, any of Defendant's witnesses, or any Defense expert within his area of expertise.

His opinions are based on an interview, evaluation, and physical examination of the Plaintiffs as identified in the reports referenced in the chart below, and a review of the Plaintiffs' health care records, testimony taken and to be taken in this

case, any specific literature he may have relied upon, and his education, training, and experience.

At this time, Plaintiffs have no further knowledge of the mental impressions, opinions and facts known to this expert other than those contained in his reports. For a more detailed discussion of his opinions and bases for those opinions, please see his reports, which are attached as noted in the chart below and are incorporated by reference into this designation. Dr. Altman is available for deposition and Defendant may examine him for a more detailed explanation of his opinions and basis for those opinions relating to this case. Once he has given deposition or other testimony in this case, Plaintiffs incorporate such testimony by reference into this designation.

A list of the cases Dr. Altman has testified in either by deposition or trial, as well as his fee schedule, are attached as noted in the chart below and are incorporated by reference into this designation.

Dr. Altman reserves the right to use any exhibits previously produced by Plaintiffs, any part or part of his expert report or cited literature, any exhibits that have or will be exchanged in discovery, and any documents that he brings with him to his deposition. Dr. Altman also reserves the right to use summary tables to describe his opinions.

Description	Type	Case #	Bates Beginning	Bates Ending
5:19-cv-00506 (Kris Workman)				
Bagwell-Altman Life Care Plan for Kris Workman	Expert	19-506	002836	002903

Description	Type	Case #	Bates Beginning	Bates Ending
Life Care Cost Analysis for Kris Workman	Expert	19-506	002904	002911
Altman CV	Expert	19-506	003405	003411
Altman Testimony List	Expert	19-506	003418	003443
Bagwell-Altman Fee Agreement	Expert	19-506	003458	003461
5:19-cv-00678 (David Colbath)				
Life Care Cost Analysis for David Colbath	Expert	19-678	002489	002492
Life Care Plan for David Colbath	Expert	19-678	002493	002528
Altman CV	Expert	19-678	003910	003916
Altman Testimony List	Expert	19-678	003923	003948
Altman-Bagwell Fee Agreement	Expert	19-678	003963	003966
Altman-Bagwell Life Care Plan Spreadsheet	Expert	19-678	004065	004068

21. George Stephen Best, M.D.

Areas of Expertise: Urology

Dr. George Stephen Best is a Board-Certified Physician, holding a certification from the American Board of Urology in the specialties of adult and pediatric urology. He earned his medical degree from the University of Texas Health Science Center and his B.A. from the University of Texas in Austin, Texas. For a more

detailed summary of Dr. Best's skills, training, education, experience, and knowledge, please see his curriculum vitae, which is attached as noted in the chart below and is incorporated by reference into this designation.

Dr. Best will testify as to any urological or related issues in this case, such as fertility issues, for Plaintiff Kris Workman in the case identified below. He will testify to any subject on which he has factual knowledge or is within his area of expertise. He will testify regarding any opinion or fact or issue raised by the Defendant, its employees, any of Defendant's witnesses, or any Defense expert within his area of expertise.

His opinions are based on an interview, evaluation, and physical examination of the Plaintiff as identified in the report referenced in the chart below, and a review of the Plaintiff's health care records, testimony taken and to be taken in this case, any specific literature he may have relied upon, and his education, training, and experience.

At this time, Plaintiffs have no further knowledge of the mental impressions, opinions and facts known to this expert other than those contained in his reports. For a more detailed discussion of his opinions and bases for those opinions, please see his reports, which are attached as noted in the chart below and are incorporated by reference into this designation. Dr. Best is available for deposition and Defendant may examine him for a more detailed explanation of his opinions and basis for those opinions relating to this case. Once he has given deposition or other testimony in this case, Plaintiffs incorporate such testimony by reference into this designation.

Dr. Best has not provided testimony either by deposition or trial within the last four years, and he charges \$350.00 per hour for his professional services.

Dr. Best reserves the right to use any exhibits previously produced by Plaintiffs, any part or part of his expert report or cited literature, any exhibits that have or will be exchanged in discovery, and any documents that he brings with him to his deposition. Dr. Best also reserves the right to use summary tables to describe his opinions.

Description	Type	Case #	Bates Beginning	Bates Ending
5:19-cv-00506 (Kris Workman)				
Best Report [K. Workman]	Expert	19-506	003499	003500
Best CV	Expert	19-506	003501	003501

22. Carl M. Hubbard, Ph.D., CFA

Areas of Expertise: Economics and Finance

Carl M. Hubbard is an expert in economic and financial analysis. He received his doctoral degree in Economics from Texas Tech University, his M.B.A. from Hardin-Simmons University, and his B.B.A. in Finance from McMurry College. Dr. Hubbard spent much of his career holding various distinguished positions at Trinity University in San Antonio, Texas and has maintained an active economic consulting practice. For a more detailed summary of Dr. Hubbard's skills, training, education, experience, and knowledge, please see his curriculum vitae that is attached as noted in the chart below and is incorporated by reference into this designation.

Dr. Hubbard will testify as to any economic or financial in this case for the Plaintiffs in the cases identified below. He will testify as to any subject on which he has factual knowledge or is within his area of expertise. He will testify regarding

any opinion or fact or issue raised by the Defendant, its employees, any of Defendant's witnesses, or any Defense expert within his area of expertise. His expected testimony will address damage issues surrounding the facts that are the subject of this lawsuit. His opinions are based on a review of testimony taken and to be taken in this case, a list of documents described in his expert report, any specific literature he may have relied upon, and his education, training, skills, knowledge and experience including the documents attached to Dr. Hubbard's reports. Dr. Hubbard has reviewed the materials listed in his reports.

At this time, Plaintiffs have no further knowledge of the mental impressions, opinions and facts known to this expert other than those contained in his reports. For a more detailed discussion of his opinions and bases for those opinions, please see his reports, which are attached as noted in the chart below and are incorporated by reference into this designation. Dr. Hubbard is available for deposition and Defendant may examine him for a more detailed explanation of his opinions and basis for those opinions relating to this case. Once he has given deposition or other testimony in this case, Plaintiffs incorporate such testimony by reference into this designation.

A list of the cases Dr. Hubbard has testified in either by deposition or trial, as well as his fee schedule, are attached as noted in the chart below and are incorporated by reference into this designation.

Dr. Hubbard reserves the right to use any exhibits previously produced by Plaintiffs, any part or part of his expert report or cited literature, any exhibits that have or will be exchanged in discovery, and any documents that he brings with him to his deposition. Dr. Hubbard also reserves the right to use summary tables to describe his opinions.

Description	Type	Case #	Bates Beginning	Bates Ending
5:19-cv-00506 (Kris Workman)				
Hubbard CV	Expert	19-506	003502	003507
Hubbard Fee Schedule	Expert	19-506	003508	003508
Hubbard Testimony List	Expert	19-506	003509	003509
Hubbard Report (Kris Workman)	Expert	19-506	003565	003573
5:19-cv-00678 (David Colbath)				
Hubbard CV	Expert	19-678	004057	004062
Hubbard Fee Schedule	Expert	19-678	004063	004063
Hubbard Testimony List	Expert	19-678	004064	004064
Hubbard Report (D. Colbath)	Expert	19-678	004069	004076
5:19-cv-00705 (Kyle Workman & Morgan Harris)				
Morgan Harris				
Hubbard Report [Morgan Harris]	Expert	MHARRIS-19-705	000754	000761
Hubbard CV	Expert	MHARRIS-19-705	000762	000767
Hubbard Fee Schedule	Expert	MHARRIS-19-705	000768	000768
Hubbard Testimony List	Expert	MHARRIS-19-705	000769	000769

23. L. Douglas Wilkerson, M.D.

Area of Expertise: Neurology

Dr. L. Douglas Wilkerson is in private practice as a neurologist. He is Board Certified by the American Board of Pediatrics and by the American Board of Psychiatry and Neurology. Dr. Wilkerson received his M.D. from Emory University in Atlanta, Georgia and his B.S. from Davidson College in Davidson, North Carolina. For a more detailed summary of Dr. Wilkerson's skills, training, education, experience, and knowledge, please see his curriculum vitae that is attached as noted in the chart below and is incorporated by reference into this designation.

Dr. Wilkerson will testify as to any neuropathy and lead toxicity issues in this case for Plaintiff Morgan Harris as identified below. He will testify to any subject on which he has factual knowledge or is within his area of expertise. He will testify regarding any opinion or fact or issue raised by the Defendant, its employees, any of Defendant's witnesses, or any Defense expert within his area of expertise.

His opinions are based on an interview and evaluation of Plaintiff Morgan Harris as identified in the report referenced in the chart below, which also reference the records he reviewed, such as Plaintiff's health care records, testimony taken and to be taken in this case, any specific literature he may have relied upon, and his education, training, and experience.

At this time, Plaintiffs have no further knowledge of the mental impressions, opinions and facts known to this expert other than those contained in his reports. For a more detailed discussion of his opinions and bases for those opinions, please see his reports, which are attached as noted in the chart below and are incorporated

by reference into this designation. Dr. Wilkerson is available for deposition and Defendant may examine him for a more detailed explanation of his opinions and basis for those opinions relating to this case. Once he has given deposition or other testimony in this case, Plaintiffs incorporate such testimony by reference into this designation.

A list of the cases Dr. Wilkerson has testified in either by deposition or trial, as well as his fee schedule, are attached as noted in the chart below and are incorporated by reference into this designation.

Dr. Wilkerson reserves the right to use any exhibits previously produced by Plaintiffs, any part or part of his expert report or cited literature, any exhibits that have or will be exchanged in discovery, and any documents that he brings with him to his deposition. Dr. Wilkerson also reserves the right to use summary tables to describe his opinions.

Description	Type	Case #	Bates Beginning	Bates Ending
5:19-cv-00705 (Kyle Workman & Morgan Harris)				
Morgan Harris				
Wilkerson Report [M. Harris]	Expert	MHARRIS-19-705	000739	000748
Wilkerson CV	Expert	MHARRIS-19-705	000749	000751
Wilkerson Fee Schedule	Expert	MHARRIS-19-705	000752	000752
Wilkerson Testimony List	Expert	MHARRIS-19-705	000753	000753

24. Robert E. Todd, M.D.

Area of Expertise: Neurology

Dr. Robert E. Todd is a neurologist. He is double-board-certified, being named a Diplomate of the National Board of Medical Examiners and a Diplomate of the American Board of Psychiatry and Neurology. Dr. Todd received his M.D. from SUNY HSC Syracuse and his B.S. in Pharmacy from Fordham University in New York, New York. For a more detailed summary of Dr. Todd's skills, training, education, experience, and knowledge, please see his curriculum vitae that is attached as noted in the chart below and is incorporated by reference into this designation.

Dr. Todd will testify as to any neuropathy and lead toxicity issues in this case for Plaintiff David Colbath as identified below. He will testify to any subject on which he has factual knowledge or is within his area of expertise. He will testify regarding any opinion or fact or issue raised by the Defendant, its employees, any of Defendant's witnesses, or any Defense expert within his area of expertise.

His opinions are based on an interview and evaluation of Plaintiff David Colbath as identified in the report referenced in the chart below, which also reference the records he reviewed, such as Plaintiff's health care records, testimony taken and to be taken in this case, any specific literature he may have relied upon, and his education, training, and experience.

At this time, Plaintiffs have no further knowledge of the mental impressions, opinions and facts known to this expert other than those contained in his reports. For a more detailed discussion of his opinions and bases for those opinions, please see his reports, which are attached as noted in the chart below and are incorporated

by reference into this designation. Dr. Todd is available for deposition and Defendant may examine him for a more detailed explanation of his opinions and basis for those opinions relating to this case. Once he has given deposition or other testimony in this case, Plaintiffs incorporate such testimony by reference into this designation.

A list of the cases Dr. Todd has testified in either by deposition or trial, as well as his fee schedule, are attached as noted in the chart below and are incorporated by reference into this designation.

Dr. Todd reserves the right to use any exhibits previously produced by Plaintiffs, any part or part of his expert report or cited literature, any exhibits that have or will be exchanged in discovery, and any documents that he brings with him to his deposition. Dr. Todd also reserves the right to use summary tables to describe his opinions.

Description	Type	Case #	Bates Beginning	Bates Ending
5:19-cv-00678 (David Colbath)				
Todd CV	Expert	19-678	003696	003698
Todd Testimony List	Expert	19-678	003699	003702
Todd Fee Documents	Expert	19-678	003703	003710
Lead Toxicity: What Are U.S. Standards for Lead Levels?	Expert	19-678	003711	003719
Blood Lead Levels in Emergency Department Patients with Retained Lead Bullets and Shrapnel	Expert	19-678	003720	003724
Neuropathies associated with excessive exposure to lead	Expert	19-678	003725	003726

Description	Type	Case #	Bates Beginning	Bates Ending
Neurotoxic Effects and Biomarkers of Lead Exposure: A Review	Expert	19-678	003727	003759
Pb Neurotoxicity: Neuropsychological Effects of Lead Toxicity	Expert	19-678	003760	003767
World Health Organization: “Lead poisoning and health”	Expert	19-678	003768	003773
Todd Report [D. Colbath]	Expert	19-678	003774	003909

II. NON-RETAINED EXPERTS

Plaintiffs designate treating providers identified in Plaintiffs’ initial disclosures and supplements. These treating witnesses will testify to only subject matter covered within their medical records. Specifically, their testimony will be confined to “facts disclosed during care and treatment of the patient” and “causation of a plaintiff’s injuries and a plaintiff’s prognosis so long as the [treating provider] formed those opinions based on the care-provider’s personal knowledge and observations during the course and care of treatment.” *Kim v. Time Ins. Co.*, 267 F.R.D. 499, 502 (S.D. Tex. 2008) (cleaned up) (collecting cases). Plaintiffs’ medical records have been previously produced to the United States. Plaintiffs incorporate those lists and records by reference herein. Plaintiffs also reserve the right to use the deposition testimony or call live these treating doctors. At this time, Plaintiffs have no further

knowledge of the witnesses other than what is reflected in the medical records. Moreover, a significant portion of the subsequent treatment occurred at medical facilities within the control of the United States. Therefore, the United States has equal access to those records.

Plaintiffs designate the following non-retained medical treating professionals who were previously identified in a separate listing to the United States on April 17, 2020, and who had previously been identified in Plaintiffs' initial disclosures and supplements.

5:18-cv-00712-XR (Vidal)

Margarette Vidal

Dr. Michael Beltran—Surgeon
Brooke Army Medical Center (aka SAMMC)
3551 Roger Brooke Drive #211
Ft Sam Houston, Texas 78234

Dr. Beltran is a specialist in orthopedic surgery and is expected to testify regarding his education, experience, and credentials to the extent they relate to his opinions about Margarette Vidal's injuries and medical care. Dr. Beltran examined and treated Margarette Vidal and may testify regarding Ms. Vidal's diagnoses and the treatment he provided for the injuries she suffered in the shooting and related conditions. Dr. Beltran may also testify regarding the type, frequency, details, and costs of reasonable and necessary medical care and treatment made necessary by the injuries suffered by Margarette Vidal in the shooting, as well as related matters. For further details regarding her treatment by Dr. Beltran, Margarette Vidal also refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

Dr. Michael Cahill—Cardiologist
Brooke Army Medical Center
3551 Roger Brooke Drive #211
Ft Sam Houston, Texas 78234

Dr. Cahill is a specialist in cardiology and is expected to testify regarding his education, experience, and credentials to the extent they relate

to his opinions about Margarette Vidal's injuries and medical care. Dr. Cahill examined and treated Margarette Vidal and may testify regarding Ms. Vidal's diagnoses and the treatment he provided for the injuries she suffered in the shooting and related conditions. Dr. Cahill may also testify regarding the type, frequency, details, and costs of reasonable and necessary medical care and treatment made necessary by the injuries suffered by Margarette Vidal in the shooting, as well as related matters. For further details regarding her treatment by Dr. Cahill, Margarette Vidal also refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

Monica Shabbir

Elizabeth Diaz, LCSW
Community Health Centers of South Central Texas
Seguin Family Health Center
1104 Jefferson Ave
Seguin, TX 78155
(830) 379-9797

Ms. Diaz is a primary care provider for Plaintiff Monica Shabbir and is expected to testify regarding her education, experience, and credentials to the extent they relate to her opinions about Ms. Shabbir's injuries and patient care. Ms. Diaz has examined and treated Ms. Shabbir and may testify regarding the care she provided for Ms. Shabbir's injuries suffered in the shooting, including her memories and observations of Ms. Shabbir's medical and related treatment journey. Ms. Diaz may also testify regarding the type, frequency, details, and costs of reasonable and necessary future care made necessary by the injuries suffered by Ms. Shabbir in the shooting, as well as related matters. For further details regarding Ms. Diaz' role in the care provided to Ms. Shabbir, Plaintiff refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

5:18-cv-00881-XR (Uhl) – Peery

Charlene Uhl, Individually

Ginger Gray
Abiding Hope Christian Counseling
19115 Nacogdoches Loop #12
San Antonio, TX 78266

(210) 236-7768

Ms. Gray is a counselor for Plaintiff Charlene Uhl and is expected to testify regarding her education, experience, and credentials to the extent they relate to her opinions about Ms. Uhl's mental health status relating to the shooting. Ms. Gray has examined and treated Ms. Uhl and may testify regarding the care she provided for Ms. Uhl's mental health-related injuries suffered because of the shooting, including her memories and observations of Ms. Uhl's mental health journey to date. Ms. Gray may also testify regarding the type, frequency, details, and costs of reasonable and necessary future mental health care made necessary by the injuries suffered by Ms. Uhl because of the shooting, as well as related matters. For further details regarding Ms. Gray's role in the care provided to Ms. Uhl, Plaintiff refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

Lean Drozd
Courage Ranch
3292 TX-97
Floresville, TX 78114
(832) 721-3874

Ms. Drozd is a counselor for Plaintiff Charlene Uhl and is expected to testify regarding her education, experience, and credentials to the extent they relate to her opinions about Ms. Uhl's mental health status relating to the shooting. Ms. Drozd has examined and treated Ms. Uhl and may testify regarding the care she provided for Ms. Uhl's mental health-related injuries suffered because of the shooting, including her memories and observations of Ms. Uhl's mental health journey to date. Ms. Drozd may also testify regarding the type, frequency, details, and costs of reasonable and necessary future mental health care made necessary by the injuries suffered by Ms. Uhl because of the shooting, as well as related matters. For further details regarding Ms. Drozd's role in the care provided to Ms. Uhl, Plaintiff refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

5:19-cv-00714-XR (Solis)

Rosanne Solis

Dr. Rachel Cobos—Surgeon
University Hospital
4502 Medical Dr.

San Antonio, Texas 78229

Dr. Cobos is a specialist in trauma medicine/surgery and is expected to testify regarding her education, experience, and credentials to the extent they relate to her opinions about Rosanne Solis' injuries and medical care. Dr. Cobos examined and treated Rosanne Solis and may testify regarding her diagnoses and the treatment she provided for injuries suffered in the shooting, including but not limited to Rosanne Solis' gunshots and related conditions. Dr. Cobos may also testify regarding the type, frequency, details, and costs of reasonable and necessary medical care and treatment made necessary by the injuries suffered by Rosanne Solis in the shooting, as well as related matters. For further details regarding her treatment by Dr. Cobos, Plaintiff also refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

Jacinto Ybarra, LCSW
Camino Real of Floresville
1323 Third St.
Floresville, Texas 78114
(830) 216-7402

Mr. Ybarra is a Licensed Clinical Social Worker and mental health care provider for Plaintiff Rosanne Solis and is expected to testify regarding his education, experience, and credentials to the extent they relate to his opinions about Ms. Solis' mental health status relating to the shooting. Mr. Ybarra has examined and treated Ms. Solis and may testify regarding the care he provided for Ms. Solis' mental health-related injuries suffered because of the shooting, including his memories and observations of Ms. Solis' mental health journey to date. Mr. Ybarra may also testify regarding the type, frequency, details, and costs of reasonable and necessary future mental health care made necessary by the injuries suffered by Ms. Solis because of the shooting, as well as related matters. For further details regarding Mr. Ybarra's role in the care provided to Ms. Solis, Plaintiff refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

Joaquin Ramirez

Dr. Kenneth Kingdon—Surgeon
Connolly Memorial Medical Center
499 10th St.
Floresville, Texas 78114

Dr. Kingdon is a specialist in general surgery and is expected to testify regarding his education, experience, and credentials to the extent they relate to his opinions about Joaquin Ramirez' injuries and medical care. Dr. Kingdon examined and treated Joaquin Ramirez and may testify regarding his diagnoses and the treatment he provided for injuries suffered in the shooting, including but not limited to Joaquin Ramirez' gunshots and related conditions. Dr. Kingdon may also testify regarding the type, frequency, details, and costs of reasonable and necessary medical care and treatment made necessary by the injuries suffered by Joaquin Ramirez in the shooting, as well as related matters. For further details regarding his treatment by Dr. Kingdon, Plaintiff also refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

Jacinto Ybarra, LCSW
Camino Real of Floresville
1323 Third St.
Floresville, Texas 78114
(830) 216-7402

Mr. Ybarra is a Licensed Clinical Social Worker and mental health care provider for Plaintiff Joaquin Ramirez and is expected to testify regarding his education, experience, and credentials to the extent they relate to his opinions about Mr. Ramirez' mental health status relating to the shooting. Mr. Ybarra has examined and treated Mr. Ramirez and may testify regarding the care he provided for Mr. Ramirez' mental health-related injuries suffered because of the shooting, including his memories and observations of Mr. Ramirez' mental health journey to date. Mr. Ybarra may also testify regarding the type, frequency, details, and costs of reasonable and necessary future mental health care made necessary by the injuries suffered by Mr. Ramirez because of the shooting, as well as related matters. For further details regarding Mr. Ybarra's role in the care provided to Mr. Ramirez, Plaintiff refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

5:18-cv-00949-XR (McNulty)

Lisa McNulty, as legal guardian of Minor Hailey McNulty

Dr. Rachel Cuenca, LTC USA MC
Brooke Army Medical Center

3551 Roger Brooke Drive #211
Ft Sam Houston, Texas 78234

Dr. Cuenca is a specialist in pediatric orthopedic surgery and is expected to testify regarding her education, experience, and credentials to the extent they relate to her opinions about Minor Hailey McNulty's injuries and medical care. Dr. Cuenca examined and treated Minor Hailey McNulty and may testify regarding her diagnoses and the treatment she provided for injuries suffered in the shooting and related conditions. Dr. Cuenca may also testify regarding the type, frequency, details, and costs of reasonable and necessary medical care and treatment made necessary by the injuries suffered by Minor Hailey McNulty in the shooting, as well as related matters. For further details regarding her treatment by Dr. Cuenca, Minor Plaintiff Hailey McNulty also refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

Dr. Shallimar Jonesthreatt
Brooke Army Medical Center (aka SAMMC)
3551 Roger Brooke Drive #211
Ft Sam Houston, Texas 78234

Lisa McNulty, as legal guardian of Minor James McNulty

Dr. Rachel Cuenca, LTC USA MC
Brooke Army Medical Center
3551 Roger Brooke Drive #211
Ft Sam Houston, Texas 78234

Dr. Cuenca is a specialist in pediatric orthopedic surgery and is expected to testify regarding her education, experience, and credentials to the extent they relate to her opinions about Minor James McNulty's injuries and medical care. Dr. Cuenca examined and treated Minor James McNulty and may testify regarding his diagnoses and the treatment she provided for injuries suffered in the shooting and related conditions. Dr. Cuenca may also testify regarding the type, frequency, details, and costs of reasonable and necessary medical care and treatment made necessary by the injuries suffered by Minor James McNulty in the shooting, as well as related matters. For further details regarding her treatment by Dr. Cuenca, Minor Plaintiff James McNulty also refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

Dr. Shallimar Jonesthreatt
Brooke Army Medical Center (aka SAMMC)
3551 Roger Brooke Drive #211
Ft Sam Houston, Texas 78234

Ruben D. Rios, Jr., Individually and as Heir at Law to the Estate of Tara McNulty

Dr. Oladapo B. Folarin, MD—Army Psychiatrist
6410 Masonic Dr.
Alexandria, LA 71301
(318) 442-3163

Dr. Folarin is a psychiatrist and mental health care provider for Plaintiff Ruben Rios and is expected to testify regarding his education, experience, and credentials to the extent they relate to his opinions about Ruben Rios's mental health status relating to the shooting. Dr. Folarin has examined and treated Ruben Rios and may testify regarding the care he provided for Mr. Rios' mental health-related injuries suffered because of the shooting, including his memories and observations of Mr. Rios' mental health journey to date. Dr. Folarin may also testify regarding the type, frequency, details, and costs of reasonable and necessary future mental health care made necessary by the injuries suffered by Ruben Rios because of the shooting, as well as related matters. For further details regarding Dr. Folarin's role in the care provided to Ruben Rios, Plaintiff refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

5:18-cv-00951-XR (Wall/Johnson)

Deanna Staton, Individually

Roderick D. Ekmark, M.D.
13857 U.S. Hwy 87 W
La Vernia, Texas 78121
830.393.1400

Dr. Ekmark is the primary care doctor for Plaintiff Deanna Staton. Dr. Ekmark is a family medicine practitioner and is expected to testify regarding his education, experience, and credentials to the extent they relate to his opinions about Deanna Staton's medical care and treatment for the injuries she suffered because of the shooting. Dr. Ekmark has examined and treated Deanna Staton and may testify regarding his diagnoses and the treatment he provided to Ms. Staton. Dr.

Ekmark may also testify regarding the type, frequency, details, and costs of reasonable and necessary medical care and treatment made necessary by the injuries suffered by Deanna Staton because of the shooting, as well as related matters. For further details regarding Ms. Staton's treatment by Dr. Ekmark, Plaintiff refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

5:19-cv-00691-XR (Braden)

Deborah Braden, Individually

Sridhar Vasireddy, MD
Tri City Pain Associates
1350 Ashby
Seguin, Texas 78155
(830) 626-1000

Dr. Vasireddy specializes in pain management and is expected to testify regarding his education, experience, and credentials to the extent they relate to his opinions about Deborah Braden's medical care and treatment for the injuries she suffered because of the shooting. Dr. Vasireddy has examined and treated Deborah Braden and may testify regarding his diagnoses and the treatment he provided to Ms. Braden. Dr. Vasireddy may also testify regarding the type, frequency, details, and costs of reasonable and necessary medical care and treatment made necessary by the injuries suffered by Deborah Braden because of the shooting, as well as related matters. For further details regarding Ms. Braden's treatment by Dr. Vasireddy, Plaintiff refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

Michelle Carroll Bost Rodriguez, MD
Magenta Health
4949 Rittiman Road
San Antonio, TX 78218
(210) 938-9355

Dr. Rodriguez is the primary care doctor for Plaintiff Deborah Braden. Dr. Rodriguez is a family medicine practitioner and is expected to testify regarding her education, experience, and credentials to the extent they relate to her opinions about Deborah Braden's medical care and treatment for the injuries she suffered because of the shooting. Dr. Rodriguez has examined and treated Deanna Staton and may testify

regarding her diagnoses and the treatment she provided to Ms. Braden. Dr. Rodriguez may also testify regarding the type, frequency, details, and costs of reasonable and necessary medical care and treatment made necessary by the injuries suffered by Deborah Braden because of the shooting, as well as related matters. For further details regarding Ms. Braden's treatment by Dr. Rodriguez, Plaintiff refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

Carlos Jaramillo, MD, PhD
Physical Medicine and Rehabilitation, Board Certified
2829 Babcock Road, Suite 600
San Antonio, Texas 78229
(210) 955-9970

Dr. Jaramillo specializes in physical medicine and rehabilitation and is expected to testify regarding his education, experience, and credentials to the extent they relate to his opinions about Deborah Braden's medical diagnoses and rehabilitation from her injuries in the shooting. Dr. Jaramillo has examined and treated Deborah Braden and may testify regarding her rehabilitation, including his memories and observations of Deborah Braden's medical rehabilitation journey to date. Dr. Jaramillo may also testify regarding the type, frequency, details, and costs of reasonable and necessary future mental health care made necessary by the injuries suffered by Deborah Braden because of the shooting, as well as related matters. For further details regarding Dr. Jaramillo's role in the care provided to Deborah Braden, Plaintiff refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

Elizabeth Braden, as Next Friend of Zoe Zavala, a Minor

David R. Ekmark, MD
Victoria Emergency Partners
PO Box 203949
Dallas, Texas 75320-3949
(855) 580-2961

Dr. Ekmark is the primary care doctor for Minor Plaintiff Zoe Zavala. Dr. Ekmark is a family medicine practitioner and is expected to testify regarding his education, experience, and credentials to the extent they relate to his opinions about Zoe's medical care and treatment for the injuries she suffered because of the shooting. Dr. Ekmark has

examined and treated Minor Plaintiff Zoe Zavala and may testify regarding his diagnoses and the treatment he provided to Zoe. Dr. Ekmark may also testify regarding the type, frequency, details, and costs of reasonable and necessary medical care and treatment made necessary by the injuries suffered by Minor Plaintiff Zoe Zavala because of the shooting, as well as related matters. For further details regarding Zoe's treatment by Dr. Ekmark, Plaintiff refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

Glendaliz Bosques, MD
Memorial Hermann
The Institute for Rehabilitation and Research Hospital
1333 Moursand Street
Houston, Texas 77030
(713) 797-5929

Dr. Bosques specializes in physical medicine and rehabilitation and is expected to testify regarding her education, experience, and credentials to the extent they relate to her opinions about Minor Plaintiff Zoe Zavala's medical diagnoses and rehabilitation from her injuries in the shooting. Dr. Bosques has examined and treated Zoe and may testify regarding Zoe's rehabilitation, including her memories and observations of Zoe's medical rehabilitation journey to date. Dr. Bosques may also testify regarding the type, frequency, details, and costs of reasonable and necessary future mental health care made necessary by the injuries suffered by Minor Plaintiff Zoe Zavala because of the shooting, as well as related matters. For further details regarding Dr. Bosques' role in the care provided to Minor Zoe Zavala, Plaintiff refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

Carlos Jaramillo, MD, PhD
Physical Medicine and Rehabilitation, Board Certified
2829 Babcock Road, Suite 600
San Antonio, Texas 78229
(210) 955-9970

Dr. Jaramillo specializes in physical medicine and rehabilitation and is expected to testify regarding his education, experience, and credentials to the extent they relate to his opinions about Minor Plaintiff Zoe Zavala's medical diagnoses and rehabilitation from her injuries in the shooting. Dr. Jaramillo has examined and treated Zoe and may testify

regarding Zoe's rehabilitation, including his memories and observations of Zoe's medical rehabilitation journey to date. Dr. Jaramillo may also testify regarding the type, frequency, details, and costs of reasonable and necessary future mental health care made necessary by the injuries suffered by Minor Plaintiff Zoe Zavala because of the shooting, as well as related matters. For further details regarding Dr. Jaramillo's role in the care provided to Minor Zoe Zavala, Plaintiff refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

Zachary Poston

Julia Ann Vetter Nuelle
San Antonio Military Medical Center/Brooke Army Medical Center
3551 Roger Brooke Dr.
Ft. Sam Houston, TX 78234
(210) 916-8563

Dr. Vetter Nuelle is a specialist in orthopedic surgery and is expected to testify regarding her education, experience, and credentials to the extent they relate to her opinions about Zachary Poston's injuries and medical care. Dr. Vetter Nuelle examined and treated Zachary Poston and may testify regarding Zachary's diagnoses and the treatment she provided for the injuries he suffered in the shooting and related conditions. Dr. Vetter Nuelle may also testify regarding the type, frequency, details, and costs of reasonable and necessary medical care and treatment made necessary by the injuries suffered by Zachary Poston in the shooting, as well as related matters. For further details regarding his treatment by Dr. Vetter Nuelle, Zachary Poston also refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

Carlos Jaramillo, MD, PhD
Physical Medicine and Rehabilitation, Board Certified
2829 Babcock Road, Suite 600
San Antonio, Texas 78229
(210) 955-9970

Dr. Jaramillo specializes in physical medicine and rehabilitation and is expected to testify regarding his education, experience, and credentials to the extent they relate to his opinions about Zachary Poston's medical diagnoses and rehabilitation from his injuries in the shooting. Dr. Jaramillo has examined and treated Zachary Poston and may testify

regarding Zachary's rehabilitation, including his memories and observations of Zachary's medical rehabilitation journey to date. Dr. Jaramillo may also testify regarding the type, frequency, details, and costs of reasonable and necessary future mental health care made necessary by the injuries suffered by Zachary Poston because of the shooting, as well as related matters. For further details regarding Dr. Jaramillo's role in the care provided to Zachary Poston, Plaintiff refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

5:19-cv-00706-XR (Lookingbill)

Dalia Lookingbill, Individually

Lloyd Van Winkle
409 Madrid Street
Castroville, Texas 78009
(830) 538-2254

Dr. Van Winkle has been the primary care doctor for Plaintiff Dalia Lookingbill for more than 30 years. Dr. Van Winkle is a family medicine practitioner and is expected to testify regarding his education, experience, and credentials to the extent they relate to his opinions about Dalia Lookingbill's medical care and treatment for the injuries she suffered because of the shooting. Dr. Van Winkle has examined and treated Dalia Lookingbill and may testify regarding his diagnoses and the treatment he provided to Ms. Lookingbill. Dr. Van Winkle may also testify regarding the type, frequency, details, and costs of reasonable and necessary medical care and treatment made necessary by the injuries suffered by Dalia Lookingbill because of the shooting, as well as related matters. For further details regarding Ms. Lookingbill's treatment by Dr. Van Winkle, Plaintiff refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

Dalia Lookingbill, as Guardian of the Person and
Estate of Rihanna Tristan, a Minor

Richard Amiss LPC-S
The Ecumenical Center for Education, Counseling & Health
8310 Ewing Halsell Drive
San Antonio, Texas 78229
(210) 616-0885

Mr. Amiss is a mental health care provider for Minor Plaintiff Rihanna Tristan and is expected to testify regarding his education, experience, and credentials to the extent they relate to his opinions about Rihanna's mental health status relating to the shooting. Mr. Amiss has examined and treated Rihanna and may testify regarding the care he provided for Rihanna's mental health-related injuries suffered because of the shooting, including his memories and observations of Rihanna's mental health journey to date. Mr. Amiss may also testify regarding the type, frequency, details, and costs of reasonable and necessary future mental health care made necessary by the injuries suffered by Rihanna because of the shooting, as well as related matters. For further details regarding Mr. Amiss' role in the care provided to Rihanna, Plaintiff refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

Dalia Lookingbill, as Representative of the Estate of
Emily Garcia, a Deceased Minor

Daniel L. Dent, MD
University Health System
4502 Medical Dr
San Antonio, TX 78229
(210) 358-4000 Telephone
(210) 200-6002 Facsimile

Dr. Dent is a specialist in trauma surgery and is expected to testify regarding his education, experience, and credentials to the extent they relate to his opinions about Emily Garcia's injuries and medical care before her death. Dr. Dent examined and treated Minor Emily Garcia and may testify regarding Emily's diagnoses and the treatment he provided for the injuries Emily suffered in the shooting and related conditions. For further details regarding Emily's treatment by Dr. Dent, Plaintiff also refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

5:19-cv-00715-XR (McKenzie) – Alsaffar

Margaret McKenzie

Kelly Kolnick, LCSW
Saratoga County Department of Mental Health
and Addiction Services

135 South Broadway
Saratoga Springs, New York 12866

Ms. Kolnick is a Licensed Clinical Social Worker and mental health care provider for Plaintiff Margaret McKenzie and is expected to testify regarding her education, experience, and credentials to the extent they relate to her opinions about Ms. McKenzie's mental health status relating to the shooting. Ms. Kolnick has examined and treated Ms. McKenzie and may testify regarding the care she provided for Ms. McKenzie's mental health-related injuries suffered because of the shooting, including her memories and observations of Ms. McKenzie's mental health journey to date. Ms. Kolnick may also testify regarding the type, frequency, details, and costs of reasonable and necessary future mental health care made necessary by the injuries suffered by Ms. McKenzie because of the shooting, as well as related matters. For further details regarding Ms. Kolnick's role in the care provided to Ms. McKenzie, Plaintiff refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

Tammy Wheeler, PA-C
Saratoga Family Practice
15 Mapel Dell
Saratoga, New York 12866

Ms. Wheeler is a primary care physician assistant for Plaintiff Margaret McKenzie. Ms. Wheeler focuses on family medicine and is expected to testify regarding her education, experience, and credentials to the extent they relate to her opinions about Margaret McKenzie's medical care and treatment for the injuries she suffered because of the shooting. Ms. Wheeler has examined and treated Margaret McKenzie and may testify regarding her diagnoses and the treatment she provided to Ms. McKenzie. Ms. Wheeler may also testify regarding the type, frequency, details, and costs of reasonable and necessary medical care and treatment made necessary by the injuries suffered by Margaret McKenzie because of the shooting, as well as related matters. For further details regarding Ms. McKenzie's treatment by Ms. Wheeler, Plaintiff refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

Dr. Lee Nagel
The Union Center
583 Union Center
Schenectady, New York 12309

Dr. Nagel is a psychologist and mental health care provider for Plaintiff Margaret McKenzie and is expected to testify regarding his education, experience, and credentials to the extent they relate to his opinions about Margaret McKenzie's mental health status relating to the shooting. Dr. Nagel has examined and treated Margaret McKenzie and may testify regarding the care he provided for her mental health-related injuries suffered because of the shooting, including his memories and observations of Ms. McKenzie's mental health journey to date. Dr. Nagel may also testify regarding the type, frequency, details, and costs of reasonable and necessary future mental health care made necessary by the injuries suffered by Margaret McKenzie because of the shooting, as well as related matters. For further details regarding Dr. Nagel's role in the care provided to Margaret McKenzie, Plaintiff refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

5:19-cv-00806-XR (Macias)

Juan Macias

Lt. Col. Valerie Sams, M.D.
Brooke Army Medical Center
3851 Roger Brooke Dr.
Fort Sam Houston, Texas 78234
210-916-0324

Dr. Sams is a specialist in trauma medicine/surgery and is expected to testify regarding her education, experience, and credentials to the extent they relate to her opinions about Juan Macias' injuries and medical care. Dr. Sams examined and treated Juan Macias and may testify regarding her diagnoses and the treatment she provided for injuries suffered in the shooting, including but not limited to Juan Macias' multiple gunshots and pelvic fractures, extraperitoneal rectal injury, resection of Sigmoid colon, formation of Hartman pouch and end colostomy, complete urethral disruption injury, residual urinary incontinence, erectile dysfunction testicular pain, left femoral gunshot wound with large soft tissue defect and non-displaced greater trochanteric fracture, left proximal humerus gunshot wound with soft tissue defect, complicated by adhesive capsulitis and hand weakness, residual osteogenic, Chronic Pain Syndrome, and related conditions. Dr. Sams may also testify regarding the type, frequency, details, and costs of reasonable and necessary medical care and treatment made necessary by the injuries suffered by Juan Macias in the shooting, as well as related

matters. For further details regarding his treatment by Dr. Sams, Plaintiff Juan Macias also refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

Steven J. Hudak, M.D. (retired)
Brooke Army Medical Center
3851 Roger Brooke Dr. #3600
Fort Sam Houston, Texas 78234
210-916-2460

Dr. Hudak is a specialist in urology and is expected to testify regarding his education, experience, and credentials to the extent they relate to his opinions about Juan Macias' injuries and medical care. Dr. Hudak examined and treated Juan Macias and may testify regarding his diagnoses and the treatment he provided for injuries suffered in the shooting, including but not limited to Juan Macias' complete urethral disruption, low rectal injury, small bowel injury, bilateral inferior pubic rami fracture, left greater trochanter fracture, left medial and lateral thigh gunshot wound, bilateral sub-sag pulmonary embolism, pelvic sepsis, gastroparesis, infrahepatic and perisplenic abscess, and related conditions. Dr. Hudak may also testify regarding the type, frequency, details, and costs of reasonable and necessary medical care and treatment made necessary by the injuries suffered by Juan Macias in the shooting, as well as related matters. For further details regarding his treatment by Dr. Hudak, Plaintiff Juan Macias also refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

Major Justin M. Adams, R.N.
Brooke Army Medical Center
3551 Roger Brooke Dr.
Fort Sam Houston, TX 78234
210-916-7500

Major Justin Adams is a surgical trauma nurse and is expected to testify regarding his education, experience, and credentials to the extent they relate to his opinions about Juan Macias' injuries and patient care. Maj. Adams examined and treated Juan Macias and may testify regarding the nursing care he provided for Mr. Macias' injuries suffered in the shooting, including his memories and observations of Mr. Macias' medical journey over the course of the months he was in the hospital. Maj. Adams may also testify regarding the type, frequency, details, and costs of reasonable and necessary future nursing care

made necessary by the injuries suffered by Juan Macias in the shooting, as well as related matters. For further details regarding Maj. Adams's role in the nursing care provided to Plaintiff Juan Macias, Mr. Macias also refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

5:20-cv-00109-XR (Braden II)

Brenda Moulton

Darryl C. Currier, MD
601 W Person St
Stockdale, TX 78160
(830) 996-3701

Dr. Currier is the primary care doctor for Plaintiff Brenda Moulton. Dr. Currier is a family medicine practitioner and is expected to testify regarding his education, experience, and credentials to the extent they relate to his opinions about Brenda Moulton's medical care and treatment for the injuries she suffered because of the shooting. Dr. Currier has examined and treated Brenda Moulton and may testify regarding his diagnoses and the treatment he provided to Ms. Moulton. Dr. Currier may also testify regarding the type, frequency, details, and costs of reasonable and necessary medical care and treatment made necessary by the injuries suffered by Brenda Moulton because of the shooting, as well as related matters. For further details regarding Ms. Moulton's treatment by Dr. Currier, Plaintiff refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

Timothy Bischoff, MD
Mary Avila and/or
Present Custodian of Records
Camino Real Community Services
1005 B. Street
Floresville, Texas 78114
(830) 216-4326

Dr. Bischoff is a psychiatrist and mental health care provider for Plaintiff Brenda Moulton and is expected to testify regarding his education, experience, and credentials to the extent they relate to his opinions about Brenda Moulton's mental health status relating to the shooting. Dr. Bischoff has examined and treated Brenda Moulton and may testify regarding the care he provided for Ms. Moulton's mental health-

related injuries suffered because of the shooting, including his memories and observations of Ms. Moulton's mental health journey to date. Dr. Bischoff may also testify regarding the type, frequency, details, and costs of reasonable and necessary future mental health care made necessary by the injuries suffered by Brenda Moulton because of the shooting, as well as related matters. For further details regarding Dr. Bischoff's role in the care provided to Brenda Moulton, Plaintiff refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

Rebecca Castro, MD
Mary Avila and/or
Present Custodian of Records
Camino Real Community Services
1005 B. Street
Floresville, Texas 78114
(830) 216-4326

Dr. Castro specializes in psychiatry and neurology and is a health care provider for Plaintiff Brenda Moulton. She is expected to testify regarding her education, experience, and credentials to the extent they relate to her opinions about Brenda Moulton's mental health and cognitive status relating to the shooting. Dr. Castro has examined and treated Brenda Moulton and may testify regarding the care she provided for Ms. Moulton's mental health, cognitive, and related injuries suffered because of the shooting, including her memories and observations of Ms. Moulton's mental health and neurological journeys to date. Dr. Castro may also testify regarding the type, frequency, details, and costs of reasonable and necessary future health care made necessary by the injuries suffered by Brenda Moulton because of the shooting, as well as related matters. For further details regarding Dr. Castro's role in the care provided to Brenda Moulton, Plaintiff refers the United States to the medical records generated by this medical provider, which were previously produced and which are incorporated herein by reference.

Plaintiffs' medical records have been previously produced to the United States. Plaintiffs incorporate those lists and records by reference herein. Plaintiffs also reserve the right to use the deposition testimony or call live these treating

doctors. Plaintiffs do not waive their right to offer evidence of medical and billing records from other medical providers who are not identified above but who are identified in Plaintiffs' responses to disclosures. To the extent that the United States objects to their admissibility, Plaintiffs reserve the right to call any witnesses necessary to establish the foundation for admissibility of such records. Plaintiffs also cross designate any experts designated by the United States for the limited purpose of reserving the right to elicit favorable admissions at trial, either by deposition or in person.

Plaintiffs also designate the following non-retained expert witness, who was previously identified in Plaintiffs' initial disclosures and supplements and who has expertise and knowledge regarding the Texas Rangers' investigation of the shooting and related matters. Plaintiffs incorporate his deposition testimony given in this case on July 7, 2020, which contains his opinions and knowledge relevant to this case.

Terry Snyder
Texas Rangers – Company “F”
Texas Ranger Division
Texas Department of Public Safety
6100 Guadalupe Street, Building E
Austin, TX 78752
Investigator and Custodian of Records

III. OTHER WITNESSES & EXHIBITS

For a designation of potential witnesses and proposed exhibits, please see Plaintiffs' Initial Disclosures and any supplements to the Initial Disclosures. Plaintiffs incorporate those documents into this document by reference.

Category 1: Defense Witnesses who have Testified

Plaintiffs further cross-designate the following individuals who are under the control of the United States and Plaintiffs may illicit favorable testimony from those individuals:

1. Special Agent Robert Spencer

Subject Matter: Robert Spencer serves as a Special Agent with the Air Force Office of Special Investigations and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017. Special Agent Spencer serves as the computer systems officer for representative with the criminal justice information system of the FBI for the Air Force and OSI. In his current capacity as a program manager for the CJIS criminal justice information services program, he is the sole representative for the Air Force in dealing with the FBI.

Additionally, Special Agent Spencer has been identified as a FRCP 30(b)(6) corporate representative and is expected to offer testimony on:

- Policies, procedures, practices, checklists, and protocols concerning Air Force Security Force's and AFOSI's execution of DoD Instruction 7730.47-M Volume 1. This topic includes, but is not limited to, the monthly submission of information to the DMDC and the DIBRS database for centralization of the collection of information reportable by the DoD Components pursuant to The Brady Handgun Violence Prevention Act of 1993. This topic includes but is not limited to, information concerning I2MS, as noted on pages 8–9 of DODIG-2015-011.
- Policies, procedures, practices, checklists, and protocols concerning the Air Force Security Force's and AFOSI's execution of DoD

Instruction 5505.11. This topic includes, but is not limited to, the submission of fingerprints and final disposition reports to FBI CJIS by both the Air Force Security Force and AFOSI. This topic includes, but is not limited to, the process by which Devin Kelley's fingerprints and final disposition report should have been reported to FBI CJIS.

Facts and Opinions: A summary of the facts and opinions of this witness can be found in the oral deposition given on September 18, 2019. This deposition transcript and accompanying exhibits are incorporated by reference into this designation.

2. Kimberly J. Del Greco

Subject Matter: Kimberly J. Del Greco serves as the Assistant Director at the FBI and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017. Assistant Director Del Greco oversees the National Instant Criminal Background Check Section, the Biometric Services Section, and the IT component of the Criminal Justice Information Services Division for the FBI.

Additionally, Assistant Director Del Greco has been identified as a FRCP 30(b)(6) corporate representative and is expected to offer testimony on the FBI and the process in which the NICS receives information and processes background checks, including the handouts, manuals, course materials, or other documents concerning the training or education of any Air Force employee on fingerprint collection and final disposition submission procedures.

Facts and Opinions: A summary of the facts and opinions of this witness can be found in the oral deposition given on November 21, 2019. This deposition transcript and accompanying exhibits are incorporated by reference into this designation.

3. Colonel Owen W. Tullos

Subject Matter: Colonel Owen W. Tullos serves as the Staff Judge Advocate for the Air Force Office of Special Investigations and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017.

Facts and Opinions: A summary of the facts and opinions of this witness can be found in the oral deposition given on December 4, 2019. This deposition transcript and accompanying exhibits are incorporated by reference into this designation.

4. Jacqueline Albright

Subject Matter: Jacqueline Albright serves as the Inspector General for the Air Force Office of Special Investigations and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017. Inspector General Albright was the Deputy Director of the OSI Region 2 at the time that Detachment 225 had an investigation regarding Devin Kelley.

Facts and Opinions: A summary of the facts and opinions of this witness can be found in the oral deposition given on December 5, 2019. This deposition transcript and accompanying exhibits are incorporated by reference into this designation.

5. Yonatan Holz

Subject Matter: Yonatan Holz formerly served as a Special Agent with the Air Force Office of Special Investigations and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017. Mr. Holz was at Holloman Air Force Base and involved in the Devin Kelley investigation.

Facts and Opinions: A summary of the facts and opinions of this witness can be found in the oral deposition given on December 13, 2019. This deposition transcript and accompanying exhibits are incorporated by reference into this designation.

6. Shelley Ann Verdego

Subject Matter: Shelley Ann Verdego serves as an employee of the Defense Human Resource Activity, a component of the Department of Defense and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017.

Additionally, Ms. Verdego has been identified as a FRCP 30(b)(6) corporate representative and is expected to offer testimony on:

- Policies, procedures, practices, checklists, and protocols concerning the FBI CJIS NICS database and how other databases such as Next Gen (NGI) (formerly Integrated Automated Fingerprint Identification System (IAFIS)), NCIC, NIBRS, and Uniform Crime Report (UCR) are used to populate it. This topic includes, but is not limited to, the process by which the FBI receives and subsequently uses the information from DIBRS to prevent the purchase of firearms by any person prohibited by one of the eight listed categories.

Facts and Opinions: A summary of the facts and opinions of this witness can be found in the oral deposition given on December 17, 2019. This deposition transcript and accompanying exhibits are incorporated by reference into this designation.

7. Colonel John Owen

Subject Matter: Colonel John Owen serves as the Division Chief at the Military Justice Division and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017.

Additionally, Colonel Owen has been identified as a FRCP 30(b)(6) corporate representative and is expected to offer testimony on:

- Policies, procedures, practices, checklists, and protocols concerning probable cause determinations by a Staff Judge Advocate, especially to include, when a determination should be made, and any training given to guide Judge Advocates on probable cause determinations.

Facts and Opinions: A summary of the facts and opinions of this witness can be found in the oral deposition given on December 18, 2019. This deposition transcript and accompanying exhibits are incorporated by reference into this designation.

8. James Hoy

Subject Matter: James Hoy serves as a Special Agent with the Air Force Office of Special Investigations and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017. Mr. Holz was at Holloman Air Force Base and involved in the Devin Kelley investigation.

Facts and Opinions: A summary of the facts and opinions of this witness can be found in the oral deposition given on January 7, 2020. This deposition transcript and accompanying exhibits are incorporated by reference into this designation.

9. Major Nathan McLeod-Hughes

Subject Matter: Major Nathan McLeod-Hughes is a government civilian, serving in the 375th Logistics Readiness Squadron and he is the flight chief for the Deployment and Distribution Flight and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017. Major McLeod-Hughes was at Holloman Air Force Base and involved in the Devin Kelley investigation.

Facts and Opinions: A summary of the facts and opinions of this witness can be found in the oral deposition given on January 9, 2020. This deposition transcript and accompanying exhibits are incorporated by reference into this designation.

10. Clinton Mills

Subject Matter: Clinton Mills serves as a Technical Sergeant in the Air Force and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017. Mr. Mills was at Holloman Air Force Base and involved in the Devin Kelley investigation.

Facts and Opinions: A summary of the facts and opinions of this witness can be found in the oral deposition given on January 10, 2020. This deposition transcript and accompanying exhibits are incorporated by reference into this designation.

11. Tech Sgt. Ryan Sablan

Subject Matter: Tech Sgt. Ryan Sablan serves as a Security Manager in the Air Force and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017. Tech Sgt. Sablan was at Holloman Air Force Base and involved in the Devin Kelley investigation.

Facts and Opinions: A summary of the facts and opinions of this witness can be found in the oral deposition given on January 14, 2020. This deposition transcript and accompanying exhibits are incorporated by reference into this designation.

12. Colonel James Hudson

Subject Matter: Colonel James Hudson serves in the Air Force and is expected to offer testimony related to the actions and failures in the United States Government

that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017. Colonel Hudson was at Holloman Air Force Base and involved in the Devin Kelley investigation.

Facts and Opinions: A summary of the facts and opinions of this witness can be found in the oral deposition given on January 16, 2020. This deposition transcript and accompanying exhibits are incorporated by reference into this designation.

13. Lt. Colonel Robert C. Bearden

Subject Matter: Lt. Colonel Robert C. Bearden serves as the Vice Commander, 10th Air Base Wing, in the Air Force Academy and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017. Lt. Colonel Bearden was at Holloman Air Force Base and involved in the Devin Kelley investigation.

Facts and Opinions: A summary of the facts and opinions of this witness can be found in the oral deposition given on January 16, 2020. This deposition transcript and accompanying exhibits are incorporated by reference into this designation.

14. Randall Taylor

Subject Matter: Randall Taylor is a retired military serviceman, and formerly served as a Special Agent with the Air Force Office of Special Investigations and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017. Mr. Taylor

was a Special Agent in Charge at Detachment 225 at Holloman Air Force Base and involved in the Devin Kelley investigation.

Facts and Opinions: A summary of the facts and opinions of this witness can be found in the oral deposition given on February 25, 2020. This deposition transcript and accompanying exhibits are incorporated by reference into this designation.

15. Lyle Bankhead

Subject Matter: Lyle Bankhead serves as a Master Sergeant E7 and oversees all the criminal investigations for all the bases in the Pacific for the Air Force and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017. Mr. Bankhead was a Master Sergeant at Detachment 225 at Holloman Air Force Base and involved in the Devin Kelley investigation.

Facts and Opinions: A summary of the facts and opinions of this witness can be found in the oral deposition given on February 27, 2020. This deposition transcript and accompanying exhibits are incorporated by reference into this designation.

16. Sergeant (Ret.) Vince Bustillo

Subject Matter: Sergeant (Ret.) Vince Bustillo served as Special Agent-in-Charge assigned to Holloman Air Force Base from October 2009 until October 31, 2011 and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017.

Facts and Opinions: A summary of the facts and opinions of this witness can be found in the oral deposition given on March 10, 2020. This deposition transcript and accompanying exhibits are incorporated by reference into this designation.

Category 2: Defense Witnesses that will Testify and/or Any Future Designated 30(b)(6) Corporate Representatives

1. Phillip Douglas Countryman

Subject Matter: Phillip Douglas Countryman served as an Assistant SJA assigned to Holloman Air Force Base from April 2010 until September 2012 and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017.

2. Major Schneider Rislin

Subject Matter: Major Schneider Rislin served as a 49th Security Forces Squadron Confinement Facility Commander in November 2012 and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017.

3. Lt. Colonel (Ret.) Dawn Hankins

Subject Matter: Lt. Colonel (Ret.) Dawn Hankins served as Holloman Air Force Base Staff Judge Advocate assigned in June 2011, February 2012, and November

2012 and served as SJA at Holloman prior to July 2012 and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017.

4. Colonel Frank Marconi

Subject Matter: Colonel Frank Marconi served as Devin Kelley's Holloman Air Force Base Commander in June 2011 and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017.

5. Sergeant James Williams

Subject Matter: Sergeant James Williams served at Holloman as AFOSI Detachment 225 Special Agent-in Charge in June 2012 and served as Detachment 225 Enlisted Agent from August 14, 2010 until July 20, 2013 and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017.

6. (Ret.) Willie Dukes

Subject Matter: Willie Dukes served as a 49th Security Forces Squadron Confinement Facility Non-Commissioned Officer in Charge in November 2012 and is expected to offer testimony related to the actions and failures in the United States

Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017.

7. Sergeant (Ret.) Adam Arnold

Subject Matter: Sergeant (Ret.) Adam Arnold served at Holloman as AFOSI Detachment 225 Commander in June 2011-March 31, 2013 and served as Superintendent at Nellis Air Force Base from November 2012 until December 2012 and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017.

8. Ronald Rupe

Subject Matter: Ronald Rupe served as a 49th Security Forces Squadron investigator assigned in February 2012 and served as 49th Security Forces Squadron Detective from June 2004 until April 2013 and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017.

9. Richard Schnell (Civilian)

Subject Matter: Richard Schnell served as a 49th Security Forces Squadron investigator assigned in February 2012 and served as 49th Security Forces Squadron Detective from June 2004 through present and is expected to offer testimony related to the actions and failures in the United States Government that led to a former

Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017.

10. Colonel (Ret.) Humberto Morales

Subject Matter: Colonel (Ret.) Humberto Morales served as AFOSI Detachment 225 Special Agents (case agents) assigned in June 2012 and served as 2nd Field Investigations Region Commander from August 2010 until May 2012 and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017.

11. Andrew Johnson

Subject Matter: Andrew Johnson has knowledge of Security Forces Training and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017.

12. Sergeant (Ret.) Ken Salinger

Subject Matter: Sergeant (Ret.) Ken Salinger has knowledge of Security Forces Training and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017.

13. Sergeant Matthew Veltrie

Subject Matter: Sergeant Matthew Veltrie served as a desk officer at the Holoman Air Force base from August 2010 until June 2014 and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017.

14. Brigadier General Kevin Jacobsen

Subject Matter: Brigadier General Kevin Jacobsen served as the AFOSI Commander and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017.

15. Colonel Burt Borallis

Subject Matter: Colonel Burt Borallis served as the OSI Vice Commander and is expected to offer testimony related to the actions and failures in the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017.

16. Any and All Future Defendant-Designated 30(b)(6) Corporate Representatives

Category 3: Individuals who Provided Testimony to Congress at the 12/6/2017 Senate Judiciary Hearing Entitled “Firearm Accessory Regulation and Enforcing Federal and State Reporting to the National Instant Criminal Background Check System (NICS)”

1. Glenn A. Fine

Subject Matter: Glenn A. Fine serves as the Acting Inspector General of the Department of Defense Office of Inspector General.

Facts and Opinions: A summary of the facts and opinions of this witness is contained in the written report, oral testimony and supplemental Questions for the Record provided to the United States Senate Committee of the Judiciary previously produced as Bates Nos. SSS-001113–SSS-001121 and SSS-001341–SSS-001345 and is incorporated herein by reference. See also all Inspector General Reports authored by the witness including:

- Report No. DODIG-2018-035, entitled Evaluation of Fingerprint Card and Final Disposition Report Submissions by Military Service Law Enforcement Organizations, dated December 4, 2017, previously produced as Bates Nos. SSS-000077–SSS-000168;
- Report No. DODIG-2019-030, entitled Report of Investigation in the United States Air Force’s Failure to Submit Devin Kelley’s Criminal History Information to the Federal Bureau of Investigation, dated December 6, 2018, previously produced as Bates Nos. SSS-000169–SSS-000306;
- Inspector General Report, entitled Compendium of Open Office of Inspector General Recommendations to the Department of Defense, as of March 31, 2018, produced herein as Bates Nos. SSS-001346–SSS-001871; and
- Inspector General Report, entitled Compendium of Open Office of Inspector General Recommendations to the Department of Defense, as of March 31, 2019, produced herein as Bates Nos. SSS-001872–SSS-002289.

2. Douglas E. Lindquist

Subject Matter: Douglas E. Lindquist served as the Assistant Director of the Criminal Justice Information Services Division of the Federal Bureau of Investigation.

Facts and Opinions: A summary of the facts and opinions of this witness is contained in the written report and oral testimony provided to the United States Senate Committee of the Judiciary previously produced as Bates Nos. SSS-001125 – SSS-001129 and is incorporated herein by reference.

3. Heather Wilson

Subject Matter: Heather Wilson served as the 24th Secretary of the Air Force.

Facts and Opinions: A summary of the facts and opinions of this witness is contained in the written report, oral testimony and supplemental Questions for the Record provided to the United States Senate Committee of the Judiciary previously produced as Bates Nos. SSS-000404 – SSS-000405 and SSS-000406 – SSS000410 and is incorporated herein by reference.

Category 4: Command Level Individuals

A. Secretaries of Defense during the relevant time period of 1997-present:

- 1. William Cohen**
- 2. Donald Rumsfeld**
- 3. Robert Gates**
- 4. Leon Panetta**
- 5. Chuck Hagel**
- 6. Ash Carter**
- 7. Jim Mattis**
- 8. Patrick Shanahan**
- 9. Mark Esper**
- 10. Richard Spencer**

Subject Matter: These individuals served as the Secretary of Defense of the United States of America and are expected to offer testimony related to the actions and failures in the Command Levels of the Department of Defense of the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017.

B. Secretaries of the Air Force during the relevant time period of 1997-present:

- 1. Sheila Windall**
- 2. F. Whitten Peters**
- 3. Lawrence Delaney**
- 4. James Roche**
- 5. Peter Teets**
- 6. Michael Montelongo**
- 7. Michael Dominguez**
- 8. Pete Geren**
- 9. Michael Wynne**
- 10. Michael Donley**
- 11. Eric Fannin**
- 12. Deborah Lee James**
- 13. Lisa Disbrow**
- 14. Heather Wilson (see further designation above)**
- 15. Matthew Donovan**
- 16. Barbara Barret**

Subject Matter: These individuals served as the Secretary of the Air Force of the United States of America and are expected to offer testimony related to the actions and failures in the Command Levels of the Air Force of the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017.

C. Chiefs of Staff of the Air Force during the relevant time period of 1997-present:

1. **Ronald Fogleman**
2. **Ralph Eberhart**
3. **Michael E. Ryan**
4. **John Jumper**
5. **Michael Moseley**
6. **Duncan McNabb**
7. **Norton Schwartz**
8. **Mark Welsh**
9. **David Goldfein**

Subject Matter: These individuals served as the Chief of Staff of the Air Force of the United States of America and are expected to offer testimony related to the actions and failures in the Command Levels of the Air Force of the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017.

D. Under Secretary of Defense for Intelligence with the Department of Defense during the relevant time period of 1997-present:

1. **Stephen A. Cambone**
2. **James R. Clapper**
3. **Michael G. Vickers**
4. **Marcel Lettre**
5. **Joseph D. Kernan**

Subject Matter: These individuals served as the Under Secretary of Defense for Intelligence with the Department of Defense of the United States of America and are expected to offer testimony related to the actions and failures in the Command Levels of the Air Force of the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017.

E. Deputy Chief Management Officer and/or Chief Management Officer of the Department of Defense during the relevant time period of 1997-present, including, but not limited to:

1. **John H. Gibson II (CMO)**
2. **Lisa Hershman (CMO)**

Subject Matter: These individuals served as Deputy Chief Management Officer and/or Chief Management Officer of the Department of Defense of the United States of America and are expected to offer testimony related to the actions and failures in the Command Levels of the Air Force of the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017.

F. Under Secretary of Personnel and Readiness with the Department of Defense during the relevant time period of 1997-present:

1. **Edwin Dorn**
2. **Rudy de Leon**
3. **Charles Cragin (acting)**
4. **Bernard D. Rostker**
5. **David S.C. Chu**
6. **Gail H. McGinn (acting)**
7. **Clifford L. Stanley**
8. **JoAnn Rooney (acting)**
9. **Erin C. Conaton**
10. **Jessica L. Wright**
11. **Brad Carson (acting)**
12. **Peter Levine (acting)**
13. **Anthony Kurta (acting)**
14. **Robert Wilkie**
15. **James N. Stewart (acting)**
16. **Matthew Donovan (acting)**
17. **Dr. Alexis Lasselle Ross (acting)**

Subject Matter: These individuals served as Under Secretary of Personnel and Readiness with the Department of Defense of the United States of America and are expected to offer testimony related to the actions and failures in the Command Levels of the Air Force of the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017.

G. Air Force Inspector General at the United States Air Force during the relevant time period of 1997-present:

1. **Richard T. Swope**
2. **Nicholas B. Kehoe**
3. **Raymond O. Huot**
4. **Steven R. Polk**
5. **Ronald F. Sams**
6. **Marc E. Rogers**
7. **Stephen P. Mueller**
8. **Gregory A. Biscione**
9. **Anthony J. Rock**
10. **Stayce D. Harris**
11. **Sami D. Said**

Subject Matter: These individuals, all holding Lieutenant General Rank, served as Air Force Inspector General at the United States Air Force and are expected to offer testimony related to the actions and failures in the Command Levels of the Air Force of the United States Government that led to a former Airman illegally acquiring the firearm used in the Sutherland Springs First Baptist Church Shooting on November 5, 2017.

Category 5: Plaintiffs' Treating Medical Providers

Each and Every Medical Treatment Provider and Their Associated Billing Department is Identified as a Non-Retained Expert Witness.

Subject Matter: These individuals are expected to testify regarding all aspects of the past and future elements of Plaintiffs' injuries sustained in this mass shooting, including but not limited to the nature, extent, cost and causation of the same.

Facts and Opinions: The facts and opinions held by these witnesses are contained in the medical records and medical bills associated with the treatment they provided which have been previously produced by Plaintiffs, may be produced in the future by Plaintiffs, and/or obtained by Defendant by way of the requested medical authorizations provided by Plaintiffs to Defendant.

IV. ADDITIONAL RESERVATIONS

Plaintiffs further reserve the right to call any of the following witnesses or experts who may have knowledge of relevant facts:

- a) Any witness or expert which has been or will be named by any other party in any answer to Interrogatory, even if the party which designated the witness or expert is no longer a party to the lawsuit at the time of trial;
- b) Any witness or expert whose name appears on any document which has been or will be produced by any party in any response to Requests for Production;
- c) Any witness or expert whose name is reflected in any document which has been or will be obtained through the use of medical authorizations;
- d) Any witness or expert whose name is reflected in any document which has been or will be submitted to the Court by Affidavit;

- e) Any witness or expert whose name is reflected in any document which has been or will be subpoenaed by any party;
- f) Any witness or expert whose name appears in the transcript of any deposition taken in this matter; and
- g) Any witness or expert whose name is reflected in any document which has been or will be attached to the transcript of any deposition.

Descriptions provided below each retained expert's name are not intended to be an exhaustive list of the areas to be addressed by the expert. Likewise, the listing of documents or materials reviewed by any expert are not necessarily a complete listing of the materials contained within the expert's file. Rather, this information is being furnished to provide opposing counsel with an indication of the general areas that the expert will address and to provide guidance on the types of information or materials that the expert has or will review in connection with his/her work in this case.

Plaintiffs reserve the right to withdraw the designation of any expert and to aver positively that any such previously designated expert will not be called as a witness at trial, and to re-designate same as consulting expert, who cannot be called by opposing counsel.

Plaintiffs reserve the right to call rebuttal witnesses who are not designated and whose testimony cannot be reasonably foreseen until the presentation of the evidence against Plaintiffs.

Plaintiffs would name any agent servant or employee of thereof of any health care provider(s) named above who may have rendered treatment to Plaintiffs during

relevant time periods and whose name or initials appear in Plaintiffs' medical or billing records kept by said health care provider(s).

Respectfully Submitted,

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CERTIFICATE OF SERVICE

By our signatures above, we certify that a copy of Plaintiffs' Second Supplemental Combined Designation of Testifying Experts has been sent to the following on February 11, 2021 via the Court's CM/ECF notice system.

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